VPDES PERMIT FACT SHEET

This document gives pertinent information concerning the reissuance of the VPDES permit listed below. This permit is being processed as a Major Municipal permit. The effluent limitations contained in this permit will maintain the Water Quality Standards of 9 VAC 25-260 et seq. The discharges result from the operation of a sewage treatment facility and from the operation of a paper mill (the Bear Island Paper Company). This permit action includes revisions to some effluent limitations, the frequency of effluent monitoring for some parameters, and the special conditions.

1. Facility Name and Address:

   Hanover County
   Doswell Wastewater Treatment Plant
   Department of Public Utilities
   P. O. Box 470
   Hanover, Virginia 23069-0470

   Location: 15468 Theme Park Way in Doswell
   Ashland topo (149C) – see **Attachment 1**.

2. SIC Codes: 4952 for the Doswell Wastewater Treatment Plant and 2621 for the Bear Island Paper Company.

3. Permit No. VA0029521
   Expiration Date: May 18, 2008

4. Owner Contact: David Van Gelder
   Chief of Operations and Maintenance
   Telephone Number: 804/365-6235
   Facsimile Number: 804/365-6245
   E-mail: dfvangelder@co.hanover.va.us

5. Application Complete Date: April 4, 2008

   Permit Drafted By: Ray Jenkins, Piedmont Regional Office
   Date: August 20, 2008

Reviewed By:		Date:
	Gina Kelly	September 2, 2008
	Curt Linderman	November 18, 2008
	Kyle Winter	January 8, 2009

6. Receiving Stream:

Name:	North Anna River
Basin:	York River
Subbasin:	NA
Section:	3
Class:	III
Special Standards:	None

River Mile: 8-NAR003.55

1-Day, 10-Year Low Flow:	42 cfs (27 MGD)
7-Day, 10-Year Low Flow:	45 cfs (29 MGD)
30-Day, 10- Year Low Flow	49 cfs (32 MGD)
30-Day, 5-Year Low Flow:	51 cfs (33 MGD)
Harmonic Mean Flow:	126 cfs (81 MGD)

7. Operator License Requirements: Class II licensed operators are required at Doswell and at Bear Island. A Class I operator is required at Bear Island following mill expansion.

8 Reliability Class: Class I for the Doswell Wastewater Treatment Plant.

9. Permit Characterization: (Check as many as appropriate)

( ) Issuance	(X) Existing Discharge
(X) Reissuance	(X) Proposed Discharge
( ) Revoke & Reissue	(X) Effluent Limited
( ) Owner Modification	(X) Water Quality Limited
( ) Board Modification	( ) WET Limit
( ) Change of Ownership/Name	( ) Interim Limits in Permit
Effective Date:	( ) Interim Limits in Other Document (attached)
(X) Municipal	( ) Compliance Schedule Required
SIC Code(s): 4952	( ) Site Specific WQ Criteria
(X) Industrial	( ) Variance to WQ Standards
SIC Code(s): 2621	( ) Water Effects Ratio
(X) POTW	( ) Discharge to 303(d) Listed Segment
( ) PVOTW	(X) Toxics Management Program Required
(X) Private (Bear Island)	( ) Toxics Reduction Evaluation
( ) Federal	(X) Pretreatment Program Required
( ) State	( ) Storm Water Management Plan
( ) Publicly-Owned Industrial	( ) Possible Interstate Effect

10. Water Flow and Treatment Schematics: See **Attachments 2 and 12**. Attachment 2 shows the current condition. Attachment 12 reflects the proposed mill expansion at Bear Island.

11. Sewage Sludge Use or Disposal: Sewage sludge is aerobically digested, dewatered by belt press, and disposed at sanitary landfill. The Bear Island sludge is incinerated on the Bear Island site in the bark burner.

12. Material Storage: At the Doswell treatment plant, magnesium hydroxide, which is used for pH adjustment, is stored in a 4,000 gallon above ground tank. No containment is provided; topography however, would confine any spill to the area around the tank. Polymer for sludge dewatering is stored in the belt press building.

    At the Bear Island treatment plant, aqua ammonia is stored in a 24,000 gallon above ground tank that is located within a concrete dike. Phosphoric acid, polymer, and defoamer are stored in tanks in the operations building, which is designed to provide containment equal to the volume of the largest tank. Also, floor drains in the building discharge to the emergency holding basin. Additionally, diesel fuel (10,000 gallons) and gasoline (900 gallons) tanks are located in a concrete containment area.

13. Ambient Water Quality Information: See **Attachments 3 and 4**. **Attachment 3** presents ambient data on the North Anna River at the Route 30 bridge (river mile 8-NAR005.42; 1.87 miles above the discharge point). The temperature, pH, and hardness data are used to develop the waste load allocations in Attachment 7 ("MSTRANTI" calculations). **Attachment 4** develops the statistical flows on which effluent limitations are based (memorandum dated April 7, 2008 from Jennifer Palmore).

    The North Anna River at the discharge point was assessed during the 2006 305(b) / 303(d) cycle as fully supporting of all its designated uses (that is, assessed as Category 1).

14. Antidegradation Review and Comments:

    The State Water Control Board's Water Quality Standards include an antidegradation policy (9 VAC 25-260-30). All state surface waters are provided one of three levels of antidegradation protection. For Tier 1 existing uses of the water body and the water quality to protect those uses must be maintained. Tier 2 water bodies have water quality that is better than the water quality standards. Significant lowering of the water quality of Tier 2 waters is not allowed without an evaluation of the economic and social impacts. Tier 3 water bodies are exceptional waters and are so designated by regulatory amendment. The antidegradation policy prohibits new or expanded discharges into exceptional waters.

    The receiving stream is a Tier 1 waterbody. The stream was considered Tier 1 in previous effluent limitation evaluations. As those evaluations established the basis for the limitations (or lack thereof) in the permit, the stream continues to be classified as Tier 1.

15. Site Inspection: Date: September 21, 2007 Performed by: Michael Dare
    See **Attachment 5**

16. Effluent Screening and Limitation Development:

    See **Attachments 6, 7, and 14** and Tables I through IV.

Attachment 6 presents effluent data – Outfalls 001, 101, and 102.

Attachments 7 (existing facility) and 14 (with expansion at Bear Island) present mixing zone calculations (MIX.exe), the calculation of wasteload allocations (MSTRANTI), reasonable potential analyses for pollutants detected in the effluent (STATS), and human health evaluations for Outfall 001.

17. Antibacksliding: All limitations in the 2013 permit are the same or more stringent than the limitations in the 2006 permit. The control equations in the 2013 permit, however, are applied to larger statistical stream low flows than in the 2006 permit, resulting in the calculation of increased BOD_5 loadings to the receiving stream. As the underlying concentrations have not increased, the increased BOD_5 loadings do not represent backsliding. The statistical stream low flows increased because those flows were reestablished based on actual measurements at the stream gages in the Doswell area versus deriving the flows based on guaranteed release rates from Lake Anna and subtracting intervening withdrawals (see “Outfall 001 – Supplement to Table 1 for additional information).

18. Compliance Schedules: There are no compliance schedules in the 2013 permit.

19. Special Conditions:

Part I.B of the 2006 permit (see **NOTE** at end of paragraph) required that Outfall 001 be sampled and analyzed for the water quality criteria parameters and the results reported with the permit renewal application. Monitoring for permit renewal purposes is no longer being required by special condition in the permit; it is now being included in the reissuance reminder letter advising the permittee to include such monitoring in the permit renewal application. The requirement to submit such data (Part I.B in the 2006 permit) has therefore, been removed from the permit. However, as the draft permit addresses an expansion of the Bear Island paper mill, it is necessary to include a requirement for water quality criteria monitoring on the expanded discharge if the expansion occurs during the term of the permit. Such a requirement is included in the draft permit as Part I.C. [**NOTE**: The permit that was reissued in 2003 was modified in October 2006 to remove cyanide limitations on Outfall 001 (pre and post expansion) and a compliance schedule to meet the cyanide limitations that was included as Part I.D.1 in the permit that was reissued in 2003. When the cyanide compliance schedule was removed, a second compliance schedule requiring the construction of a river gaging station on the North Anna River above the Little River was moved from I.D.2 to I.D.1. A formatting change to the cover page of the permit was also included in the 2006 modification. Therefore, throughout this fact sheet, the existing permit is referred to as the 2006 permit.]

The following special conditions were in Part I.C of the 2006 permit. They are in Part I.B of the 2013 permit.

a. Special Condition 1 – Whole Effluent Toxicity (WET) Monitoring Program

VPDES Permit Regulation, 9 VAC 25-31-210 and 220 I, requires monitoring in the permit to provide for and assure compliance with all applicable requirements of the

State Water Control Law and the Clean Water Act. The proposed WET monitoring program is discussed in **Attachment 8**. Attachment 8 contains a summary of toxicity tests done during the term of the 2006 permit and spreadsheets which calculate the WET endpoints for the existing effluent flow and for the proposed expansion flow.

The required testing is the same as in the 2006 permit. The acute endpoints have been revised to a NOAEC = 100% (versus endpoints in the 2006 permit of a LC_{50} $\geq$ 100%). The chronic endpoints are less restrictive than in the 2006 permit due to the use of higher stream flows in the determination of the endpoints. The verbiage of the program has also been revised. Whereas the 2006 language required a retest if unacceptable results were obtained, the 2013 permit indicates that all test results will be evaluated for reasonable potential to determine the need for a WET limitation.

b. Special Condition 2 – Notification Levels

This special condition is required by VPDES Permit Regulation, 9 VAC 25-31-200 A for all manufacturing, commercial, mining, and silvicultural dischargers.

This special condition is the same as in the 2006 permit.

c. Special Condition 3 – Contractual Agreement

This special condition addresses the need for an appropriate contractual agreement between Hanover County and Bear Island as the County is responsible for permit compliance.

This special condition is the same as in the 2006 permit.

d. Special Condition 4 – River Flow Measurement

This special condition establishes the stream flow measurement requirements for use in the control equations in Part I.A of the permit.

This special condition has been revised to reflect the construction of the gaging station on the North Anna River above the Little River. The use of the gaging station at Route 30 is now included as a back-up gaging location. The 2006 permit did not assume that river flows would be continuously measured and recorded (at least not until the Bear Island mill was expanded). However, both gaging stations, which are owned and operated by DEQ, now continuously report data to the U. S. Geological Survey. The river flow measurement requirements in Part I.A of the permit are therefore, indicated as CONTINUOUS RECORDED. In the event that continuous data are not recorded however, this special condition establishes the required frequency of manually recording flows.

The next to last paragraph of the special condition is new to acknowledge the maximum measurement capacity of the gage above the Little River.

A reporting requirement has also been added. River flow has always been included in the reports required by the permit, but a reporting requirement was not explicitly stated in the permit.

e. Special Condition 5 – Dissolved Oxygen Monitoring

This special condition establishes the requirements of a river monitoring program for dissolved oxygen and temperature. Such monitoring provides actual information on the accuracy of the BOD control equations in the permit, which are based on limiting the dissolved oxygen sag to 0.2 mg/L.

Regarding the conditions under which this monitoring is not required, previous language in the permit waived the monitoring if the river was at flood stage, which was defined to be 1840 cfs. When the permit was reissued in 2003, this flow was revised to 750 cfs. Hanover County asked for that revision because the river can be dangerous at flows at and above 750 cfs. Dissolved oxygen data from January 1, 1995 through December 29, 2001 were evaluated. During that time there were nine occasions on which the flow was equal to or greater than 750 cfs and less than 1840 cfs. The average dissolved oxygen depletion on those nine occasions was 0.14 mg/L. The flow was therefore, revised because no significant impact was indicated at flows above 750 cfs and because of the concern about the safety of County employees.

This special condition also establishes that dissolved oxygen monitoring is not required when the river temperature is less than or equal to 10 ^{0}C and the ratio of effluent BOD_5 (in pounds per day) divided by river flow (daily mean flow in cfs) is less than or equal to 2.0. This empirical relationship was established years ago by compiling and comparing flow and loading data. The relationship must be reestablished after the expansion of the Bear Island mill.

This special condition has been revised to cite both gaging stations in regard to the high flow at which the dissolved oxygen monitoring is no longer required, "Q_{PLAN}" was deleted in the third paragraph, reference to the Regional Director was deleted in the fourth paragraph, and the reopener included as special condition 9 in the 2006 permit was moved to the end of this special condition. A low flow exclusion was also added to the second paragraph in response to a request from Hanover County. At flows below 30 cfs (as measured at the gage on the North Anna above the Little River) it is often necessary to portage for segments of the run. It is therefore, proposed that the run not be required at flows less that 30 cfs.

[Special Condition 6 – TKN vs. Ammonia Limitation – in the 2006 permit was deleted. This condition addressed substitution of an ammonia limitation for the TKN limitation if approved by the DEQ staff. This condition has been in the permit since at least 1988 and the permittee has not pursued such a substitution. If such a substitution is determined to be desirable, the permittee may submit an appropriate application and the permit can be reopened as necessary.]

f. Special Condition 6 – Pretreatment

This special condition establishes the pretreatment program for industrial users. Special Condition 7 in the 2006 permit also addresses pretreatment. This special condition is required by VPDES Permit Regulation 9 VAC 25-31-730 through 900, and 40 CFR Part 403 that require certain existing and new sources of pollution to meet specified regulations.

In the first sentence of the preamble, “or modification” was deleted for clarity. The second sentence in 6.e.(10) – “This is due no later than March 31 of each year” – was deleted because it seems to conflict with the requirement to submit the annual report by January 31 of each year.. The newspaper copies regarding noncompliance are due with the annual report on January 31.

Pretreatment is addressed in special condition 7 in the 2006 permit.

g. Special Condition 7 – Changes in Design Flow

This special condition is carried-over from previous permits and is simply a reminder that if the projected flows associated with the mill expansion change from the projections contained in the permit, the permit may have to be reopened and modified.

This special condition is the same as in the 2006 permit except that it is special condition 8 in the 2006 permit.

[Special Condition 9 – Reopener for Dissolved Oxygen – in the 2006 permit was moved to Special Condition 5 in the 2013 permit. See 19.e above.]

h. Special Condition 8 –TKN Degradability Study

This special condition requires that the permittee repeat a TKN degradability study following the Bear Island mill expansion. The TKN limitations in the permit are based on an established percentage of the TKN concentration ultimately exerting an oxygen demand (see Supplement to Table I). That percentage will have to be reestablished after the mill expansion.

This special condition has been revised by adding language that specifically requires that the study plan include an implementation schedule and that the approved study plan and schedule will be enforceable parts of the permit

i. Special Condition 9 – Macroinvertebrate Survey

This special condition requires a yearly macroinvertebrate survey in the North Anna and Pamunkey Rivers if there are major changes (e.g., expansion) in the Bear Island mill. Past surveys have shown only a minimal effect on the receiving stream in the form of organic enrichment on the benthic community structure in the North Anna and Pamunkey Rivers.

This special condition is the same as in the 2006 permit except that it is special condition 11 in the 2006 permit.

j. Special Condition 10 – Dioxin and Dibenzofuran

This special condition requires dioxin and dibenzofuran monitoring if deemed necessary, contains a reopener for limitations if needed, and limits the use of purchased, chlorine bleached Kraft pulp to 10% of the total pulp use by Bear Island.

This special condition is the same as in the 2006 permit except that it is special condition 12 in the 2006 permit.

k. Special Condition 11 – Plans and Specifications for Effluent Filter

When the Bear Island mill is expanded, the effluent from the Doswell sewage treatment facility will be filtered and used as a water source by Bear Island. This special condition is a reminder that plans and specifications for those facilities must be approved by the DEQ prior to starting construction.

This special condition is the same as in the 2006 permit except that the reference to the Virginia Department of Health has been deleted as plan approval now rests with the DEQ and it is special condition 13 in the 2006 permit.

l. Special Condition 12 – Plans and Specifications for Effluent Holding Pond

The Bear Island mill expansion will require that the effluent holding pond be expanded to 60 million gallons. This special condition requires that plans for that pond be submitted and approved prior to starting construction.

This special condition is the same as in the 2006 permit except that it is special condition 14 in the 2006 permit.

m. Special Condition 13 – EPA Application Form 2C

This special condition requires appropriate characterization of the effluent following the Bear Island mill expansion.

This special condition is the same as in the 2006 permit except that it is special condition 15 in the 2006 permit.

n. Special Condition 14 – Licensed Wastewater Operators

This special condition requires appropriately licensed wastewater works operators at the Doswell and Bear Island treatment plants. Licensed operators are required by VPDES Permit Regulation 9 VAC 25-31-200 C and the Code of Virginia § 54.1-2300 et seq., Rules and Regulations for Waterworks and Wastewater Works Operators (18 VAC 160-20-10 et seq.).

This special condition is the same as in the 2006 permit except that it is special condition 16 in the 2006 permit.

o. Special Condition 15 – 95% Design Capacity

This special condition requires that the permittee develop plans for maintaining compliance if the influent flows to the Doswell Wastewater Treatment Facility reach 95% of design capacity for any three consecutive month period. This is required by VPDES Permit Regulation 9 VAC 25-31-200 B 2 for all publicly and privately owned treatment works.

This special condition is the same as in the 2006 permit except that it is special condition 17 in the 2006 permit.

p. Special Condition 16 – Reliability Class

This special condition establishes that the Doswell Wastewater Treatment Facility meet Reliability Class I requirements. This is required by the Sewage Collection and Treatment Regulations, 9 VAC 25-60-20 and 40, for all municipal facilities.

This special condition is the same as in the 2006 permit except that it is special condition 18 in the 2006 permit.

q. Special Condition 17 – CTC and CTO Requirements

In the 2006 permit, special condition 19 addresses CTC and CTO requirements and Operation and Maintenance (O&M) Manual requirements.

In the 2013 permit, the O&M Manual requirements have been moved to new special condition 25.

The CTC and CTO requirements have been revised in accordance with Guidance Memorandum 07-2008 and the Sewage Collection and Treatment Regulations are cited in the 2013 permit versus the Sewerage Regulations. These requirements are addressed by the Code of Virginia §62.1-44.19 and the Sewage Collection and Treatment Regulations at 9 VAC 25-790.

r. Special Condition 18 – Concept Engineering Report (CER) for New or Expanded Wastewater Treatment Facilities at Bear Island

This special condition requires submittal and approval by DEQ staff of a Concept Engineering Report for construction of any new treatment facilities at Bear Island. § 62.1-44.16 of the Code of Virginia requires industrial facilities to obtain DEQ approval for proposed discharges of industrial wastewater.

This is a new special condition.

s. Special Condition 19 – Sewage Sludge Disposal

This special condition requires disposal of the sludge from the Doswell Wastewater Treatment Facility in accordance with the "VPDES Sludge Permit Application Form" submitted with the permit renewal application. VPDES Permit Regulation at 9 VAC 25-31-100 P, 220 B 2, and 420 through 720; and 40 CFR Part 503 require all treatment works treating domestic sewage to submit information on sludge use and disposal practices and to meet specified standards for sludge use and disposal.

This special condition was revised to delete reference to the Virginia Department of Health as DEQ now has responsibility for biosolids disposal and to delete reference to the "VPDES Sewage Sludge Permit Application Form". Sewage sludge disposal is addressed in special condition 20 in the 2006 permit.

t. Special Condition 20 – Sewage Sludge Reopener

This special condition is a permit reopener if any standard or disposal requirement promulgated under Section 405(d) of the Clean Water Act is more stringent that the requirements of the 2013 permit. This reopener is required by the VPDES Permit Regulation at 9 VAC 25-31-220 C.

This special condition is the same as in the 2006 permit except that it is special condition 21 in the 2006 permit.

u. Special Condition 21 – Compliance Reporting

VPDES Permit Regulation 9 VAC 25-31-190 J.4 and 220.I authorize this special condition. This condition establishes quantification levels for certain parameters and establishes protocols for calculation of reported values. This condition is necessary when pollutants are monitored by the permittee and a maximum level of quantification and/or a specific analytical method is required in order to assess compliance with a permit limit or to compare effluent quality with a numeric criterion.

Ammonia and phosphorus have been removed from part a of this special condition. The language in the remaining parts of the special condition has also been revised. Note that the language in Part 21.b regarding calculation of weekly averages is not the standard DEQ language. The standard language was revised to address complete calendar weeks to be consistent with Parts I.A.1.e and I.A.4.e of the 2013 permit. The standard language of this special condition instructs the permittee to compute weekly averages for only those weeks that are entirely contained within the month for which the monitoring report is being submitted. The control equations in Part I.A of the permit establish weekly average limitations for BOD_5 and TSS at Outfall 001. There are no monthly average limitations for those parameters at Outfall 001. Also, the control equation for BOD_5 establishes the allowable discharge level given any stream flow; that is, the allowable discharge does not remain constant at a level based on the 7Q10 stream flow as in other permits. Therefore, it is essential that data for all weeks of the year be included in the determination of permit compliance.

Compliance Reporting is addressed in special condition 22 in the 2006 permit.

v. Special Condition 22 – Indirect Dischargers

This special condition requires notification of changes in the quantity or quality of discharges into the sewage treatment system by someone other than the owner of the treatment works. It is required by VPDES Permit Regulation 9 VAC 25-31-200 B.1 and B.2 for POTWs and PVOTWs that receive waste from someone other than the owner of the treatment works.

This special condition is the same as in the 2006 permit except that it is special condition 23 in the 2006 permit.

w. Special Condition 23 – Reopener for WET Endpoints

This special condition was added at the permittee's request during reissuance of the permit in 2003 to acknowledge the permittee's belief that additional data may change or allow deletion of the proposed WET endpoints.

This special condition is the same as in the 2006 permit except that it is special condition 24 in the 2006 permit.

x. Special Condition 24 – Effluent Monitoring Frequencies

Permittees are granted a reduction in monitoring frequency based on a history of permit compliance. To remain eligible for the reduction, the permittee should not have violations related to the effluent limitations for which reduced frequencies were granted. If permittees fail to maintain the previous level of performance, the baseline monitoring frequencies should be reinstated for those parameters that were previously granted a monitoring frequency reduction.

Refer to Attachments 6B (Outfall 001) and 6C (Outfalls 101 and 201) of this fact sheet which present effluent data and comparisons of effluent data to limitations. Note that the baseline monitoring frequencies shown in these attachments and below are taken from the 1995 permit for all parameters except TSS on Outfall 201. TSS was initially included on Outfall 201 with the reissuance of the permit in 2003 at a frequency of 3 days per week, therefore 3/Week is the baseline. The indicated, <u>allowable</u> reductions in sampling frequencies are as follow:

Outfall 001: BOD_5 from 1/Day to 1/Week (Current frequency 1/Day.)
TSS from 1/Day to 3/Week (Current frequency 3/Week.)
TKN from 1/Day to 3/Week (Current frequency 3/Week.)

Outfall 101: BOD_5 from 1/Day to 1/Week (Current frequency 5/Week.)
TSS from 1/Day to 3/Week (Current frequency 3/Week.)
(There is not a limitation on TKN at Outfall 101, so a reduction cannot be computed. Current frequency 1/Month. The current frequency of 1/Month was established pursuant to a request from the permittee and the staff's best engineering judgment when the permit was reissued in 2003.)

Outfall 201 BOD_5 from 1/Day to 1/Week. (Current frequency 5/Week.)
TSS from 3/Week to 1/Week. (Current frequency 3/Week.)
(There is not a limitation on TKN at Outfall 201, so a reduction cannot be computed. Current frequency 2/Month. The current frequency of 2/Month was established pursuant to a request from the permittee and the staff's best engineering judgment when the permit was reissued in 2003.)

The 2013 permit requires a monitoring frequency of 3/Week for BOD_5, TSS, and TKN for Outfall 001. Once per week for BOD5 would not be sufficient given the control equations; i.e., the complexity of the control equations demand more than the minimum frequency allowed. Three per week is also consistent with TSS and TKN.

For Outfalls 101 and 201, frequencies of 1/Week are proposed for BOD_5 and TSS. This is consistent with the indicated reductions presented above except for TSS at Outfall 101. Current Agency protocol suggests 1/Month TSS monitoring in all municipal permits. Once per week is appropriate however, given the control equation for TSS in the permit. It also represents a significant reduction in the current monitoring frequency. TKN monitoring frequencies are the same as in the 2006 permit.

Effluent Monitoring Frequencies are addressed in special condition 25 in the 2006 permit. The language has been revised to be consistent with current guidance.

y. Special Condition 25 – O&M Manual

An O&M Manual is required by Code of Virginia § 62.1-44.19; the Sewage Collection and Treatment Regulations, 9 VAC 25-790; and the VPDES Permit Regulation, 9 VAC 25-31-190 E.

O&M Manual requirements were previously addressed in Special Condition 19. Special Condition 25 is new in this 2013 permit and the format is consistent with current guidance. Note that both the Doswell and Bear Island wastewater treatment plants are addressed.

z. Special Condition 26 – Materials Handling/Storage

This special condition implements the requirements of 9 VAC 25-31-50 A which prohibits the discharge of any wastes into State waters unless authorized by permit. Code of Virginia § 62.1-44.16 and 62.1-44.17 authorizes the Board to regulate the discharge of industrial waste or other waste.

This is a new special condition. This condition is included in all industrial and municipal VPDES permits.

aa. Special Condition 27 – Nutrient and TMDL Reopeners

Regarding part a of this special condition, Section 303(d) of the Clean Water Act requires that TMDLs (Total Maximum Daily Loads) be developed for waters listed as impaired. This special condition is to allow the permit to be reopened if necessary to bring it into compliance with any applicable TMDL approved for the receiving waters. The re-opener recognizes that, according to section 402(o)(1) of the Clean Water Act, limits and/or conditions may be either more or less stringent than those contained in this permit. Specifically, they can be relaxed if they are the result of a TMDL, basin plan, or other wasteload allocation prepared under section 303 of the Act. This special condition is included in all VPDES permits.

Regarding parts b and c of this special condition, 9 VAC 25040-70 A authorizes DEQ to include technology-based annual concentration limits in the permits of facilities that have installed nutrient control equipment, whether by new construction, expansion, or upgrade. 9 VAC 25-31-390 A authorizes DEQ to modify VPDES permits to promulgate amended water quality standards.

This is a new special condition.

bb. Special Condition 28 – Reclamation and Reuse Reopener

The mill expansion at Bear Island proposes reuse of the effluent from the Doswell WWTP. This special condition provides for reopening of the permit to incorporate appropriate reuse requirements. The reopener is included in the permit as a best engineering judgment.

This is a new special condition.

cc. Special Condition 29 – Closure of Industrial Wastewater Treatment Facilities

This special condition establishes the requirement to submit a closure plan for the Bear Island wastewater treatment facilities if the facilities are being replaced or closed (reference State Water Control Board Statutes § 62.1-44.19). (Closure of sewage treatment facilities is addressed by the Virginia Sewage Collection and Treatment Regulations.)

This is a new special condition.

dd. Special Condition 30 – Dissolved Oxygen Modeling

Due to concerns with previous modeling efforts, the DEQ has determined that remodeling of the Doswell WWTP discharge is necessary. The VPDES permit currently limits the effluent by use of a "control" equation that was derived by the DEQ in 1978. In addition, the York River Basin Water Quality Management Plan limits the discharge to 690 lbs/day of $cBOD_5$. The discharge has been addressed by several later modeling reports, including a 1988 model of the North Anna and Pamunkey Rivers by HDR Infrastructure, a 1995 regional model for the Pamunkey River by Black & Veatch, and a 1999 Conceptual Engineering Report in support of Bear Island Paper Company LLC by AWARE Environmental.

The current permit authorizes a total maximum flow of 5.75 MGD, comprised of 1.0 MGD from the municipal plant, and 4.75 MGD from Bear Island. Each of the previous modeling efforts (1978, 1988, 1995, and 1999) incorporate a total discharge flow that is different than the 5.75 MGD authorized flows. Consequently, water quality model results do not currently exist representing the combined authorized 5.75 MGD discharge flows.

The historical modeling efforts have been found to be in need of update to, among several factors: a) reflect current ambient and effluent conditions (including recent legislative Lake Contingency Plan and North Anna Lake Minimum Instream Flow policies, the effects of a heated Bear Island discharge on seasonal mixed ambient temperatures, etc.); b) address issues regarding the application of anti-degradation policies; c) to reconcile the 1988 HDR report conclusions stating that supersaturated effluent oxygenation may be needed to protect water quality when North Anna instream flows were at levels greater than 7Q10 low flows; and d) to reconcile the 1995 Black & Veatch report conclusions indicating that anticipated dissolved oxygen violations would be expected under design conditions in the Pamunkey River due to the contributing BOD loadings from the Ashland (VA0024899) and Doswell WWTPs. In addition, water quality modeling efforts performed by DEQ in 2010 for the Hanover County Courthouse STP (VA0062154) indicate a potential upstream contributing influence from the Doswell WWTP that extends beyond the historical modeled segments. Consequently, there is a need for the model to be updated to extend the length of modeled segments to full dissolved oxygen (DO) sag recovery for each of the included discharges.

An updated WQ model is also warranted to a) evaluate the continued need for the "control" equation, and the ability of the Doswell WWTP permit to conform with current DEQ guidance that limits permits to a maximum of two ambient stream flow tiers for effluent limitation development purposes, and b) to assess the municipal and Bear Island effluents as two separate permitted discharges. The Environmental Protection Agency (EPA) Region III has expressed the need for industrial effluents (such as Bear Island's) that share an outfall, but do not send their industrial wastewaters to the head works of a municipal treatment system, to secure their own separate individual permit coverage. Prior to undertaking such a step, an updated WQ model would be necessary to establish the respective effluent waste load allocations between Bear Island and the municipal plant.

This special condition establishes DEQ's intent to have the WQ model of the Doswell WWTP updated during the term of this permit. As written, the special condition does not require the permittee to undertake development of an updated WQ model. Rather, the special condition provides the permittee an opportunity to voluntarily take the lead in re-modeling efforts. Alternatively, if the permittee does not pursue or complete an approved re-modeling effort, then DEQ will develop the modeling analyses to be applied in the subsequent reissued permit cycle. This may include, but is not limited to, utilization of the DEQ Regional Water Quality Model for Free Flowing Streams.

The two (2) year schedule is intended to facilitate regulatory modification of the $cBOD_5$ waste load allocation in the York River Basin Water Quality Management Plan (9VAC25-720-120), to incorporate a) final model results if they support a different $cBOD_5$ WLA value; and b) to establish a line item waste load allocation for BIPCO.

In 2010, Bear Island submitted, in response to DEQ's suggestion, preliminary updated simulation results, using the Qual2K model, prepared by AWARE Environmental. However, DEQ staff review of AWARE's preliminary submittal has found additional model development efforts to be needed for it to be considered approvable and consistent with the special condition requirements. Further coordination with DEQ staff during the interim schedule period is encouraged. Since Hanover County is the current permit holder, the ultimate responsibility and decision to submit modeling results under this special condition rests with Hanover County.

Part I.C – Water Quality Criteria Monitoring (flowing Expansion of the Bear Island mill)

As mentioned at the beginning of this section, Part I.C of the 2013 permit requires water quality criteria sampling at Outfall 001 after the Bear Island expansion. State Water Control Law §62.1-44.21 authorizes the Board to request information needed to determine the discharge's impact on State waters. States are required to review data on discharges to identify actual or potential toxicity problems, or the attainment of water quality goals, according to 40 CFR Part 131, Water Quality Standards, subpart 131.11. To ensure that water quality criteria are maintained, the permittee is required to analyze the facility's effluent for the substances noted in Part I.C of this permit. As previously mentioned, this requirement is implemented for existing discharges as part of the application process. This special condition requires this sampling on the expanded discharge if the expansion occurs during the term of the permit.

20. Part II, Conditions Applicable to All VPDES Permits

The VPDES Permit Regulation at 9 VAC 25-31-190 requires all VPDES permits to contain or specifically cite the conditions listed.

These conditions are the same as in the 2006 permit.

21. Changes to Permit: See Table V

22. Variances/Alternate Limits or Conditions: None

23. Public Notice Information required by 9 VAC 25-31-280 B:

Publication Dates: September 20, 2012 and September 27, 2012 in the Hanover *Herald-Progress*.

Comment period: September 20, 2012 to 11:59 p.m. on October 22, 2012.

All pertinent information is on file and may be inspected or copied by contacting Ray Jenkins at:

Virginia Department of Environmental Quality (DEQ)
Piedmont Regional Office
4949-A Cox Road
Glen Allen, Virginia 23060-6296

Telephone Number 804/527-5037
Facsimile Number 804/527-5106
Email rrjenkins@deq.state.va.us

Persons may comment in writing or by email to the DEQ on the proposed permit action, and may request a public hearing, during the comment period. Comments shall include the name, address, and telephone number of the writer and of all persons represented by the commenter/requester, and shall contain a complete, concise statement of the factual basis for comments. Only those comments received within this period will be considered. The DEQ may decide to hold a public hearing, including another comment period, if public response is significant and there are substantial, disputed issues relevant to the permit.

Requests for public hearings shall state 1) the reason why a hearing is requested; 2) a brief, informal statement regarding the nature and extent of the interest of the requester or of those represented by the requester, including how and to what extent such interest would be directly and adversely affected by the permit; and 3) specific references, where possible, to terms and conditions of the permit with suggested revisions. Following the comment period, the Board will make a determination regarding the proposed permit action. That determination will become effective, unless the DEQ grants a public hearing. Due notice of any public hearing will be given.

The public may review the draft permit and application at the DEQ Piedmont Regional Office by appointment.

24. Additional Comments:

a. Storm Water: Storm water at the Doswell wastewater treatment plant is addressed by VPDES Industrial Storm Water general permit VAR051377. (Storm water at Bear Island is addressed by individual permit VA0077763.)

b. Effective August 7, 2008, a fast-track rule making procedure to amend the *Water Quality Management Planning Regulation* (9 VAC 25-720-120.C) was completed, establishing total nitrogen and total phosphorus nutrient allocations for Bear Island that are separate from Hanover County. On October 23, 2008, Bear Island filed a Registration Statement (General Permit VAN030133) for coverage under the *General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Bay Watershed in Virginia* (9 VAC 25-820). These actions were in accordance with a November 15, 2007 Settlement Agreement leading to the dismissal of the litigation *Bear Island Paper Company LLC v. State Water Control Board*. The Settlement Agreement further stipulates that "If Bear Island installs treatment technology for the control of nitrogen or phosphorus, whether by new construction, expansion, or upgrade to its wastewater treatment plant…" Bear Island will apply for and be subject to an individual VPDES permit." At that time DEQ staff intends to address all of Bear Island's discharge requirements in an individual permit(s) issued to Bear Island (i.e., Bear Island will not be included in the permit issued to Hanover County).

c. DEQ staff intends to review the modeling and development of the control equations in this permit prior to the next reissuance of this permit. The purpose of that review will be to develop seasonal, effluent limitation tiers to replace the current control equations, and may include modification of the York River Water Quality Management Plan.

d. Previous Board Action: No action affecting this permit.

e. The 2006 permit was not reissued before its expiration date due to administrative priorities.

f. Public Comment: Comments were received from Hanover County and Bear Island during the public comment period. Copies of those comments and DEQ's response are in **Attachment 15**.

g. Annual permit fee payments are up-to-date (last payment deposited on September 18, 2012).

h. The discharge is in conformance with the existing planning documents for the area.

i. This discharge is controversial and is currently meeting the required effluent limitations. Comments on the draft permit were received from EPA (see item 24.m below) and from Hanover County and Bear Island (see item 24.f above).

j. The Virginia Department of Health reviewed the permit application and had no objections to the reissuance of the permit.

k. This permittee is not currently enrolled in the eDMR program. Some of the reporting required by this permit is not compatible with eDMR.

l. This permittee does not participate in the Virginia Environmental Excellence Program (VEEP).

m. The Environmental Protection Agency has reviewed the draft permit and does not support the issuance of the 2013 permit as written.

n. In accordance with the Code of Virginia §62.1-44.15:01, the Hanover County Chairman of the Board of Supervisors, the Hanover County Administrator, and the Richmond Regional Planning District Commission were notified of the intended reissuance of this permit by copy of the public notice on September 27, 2012.

25. 303(d) Listed Segments/Total Maximum Daily Load (TMDL)

During the 2010 and 2012 305(b)/303(d) Integrated Water Quality Assessments, the North Anna River was assessed as a Category 2A water (“Waters are supporting all of the uses for which they are monitored”).

This facility discharges directly to the North Anna River in the Chesapeake Bay watershed in the Upper Pamunkey River segment (segment number PMKTF). The receiving stream has been addressed in the Chesapeake Bay TMDL, approved by EPA on December 29, 2010. The TMDL addresses dissolved oxygen (DO), chlorophyll a, and submerged aquatic vegetation (SAV) impairments in the main stem Chesapeake Bay and its tidal tributaries by establishing non-point source load allocations (LAs) and point-source waste load allocations (WLAs) for Total Nitrogen (TN), Total Phosphorus (TP) and Total Suspended Solids (TSS) to meet applicable Virginia Water Quality Standards contained in 9VAC25-260-185. This facility is considered a Significant Chesapeake Bay wastewater discharge and has been assigned a TN WLA of 65,601 pounds per year (18,273 Doswell; 47,328 Bear Island), a TP WLA of 11,451 pounds per year (1,218 Doswell; 10,233 Bear Island), and a TSS WLA of 475,107.8 pounds per year (91,366.8 Doswell; 383,741 Bear Island).

Implementation of the Chesapeake Bay TDML is currently accomplished in accordance with the Commonwealth of Virginia’s Phase I Watershed Implementation Plan (WIP), approved by EPA on December 29, 2010. The approved WIP recognizes that the TMDL nutrient WLAs for Significant Chesapeake Bay wastewater dischargers are set in two regulations: 1) the Water Quality Management Planning Regulation (9VAC25-720); and 2) the "General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Bay Watershed of Virginia" (9VAC25-820). The WIP further outlines that since TSS discharges from wastewater facilities represent an insignificant portion of the Bay's total sediment load, they may be considered in the aggregate. The WIP also states that wastewater discharges with technology-based TSS limits are considered consistent with the TMDL. The TSS limitations in the permit for the Doswell WWTP are based on secondary standards and for the Bear Island WWTP on a DEQ staff Best Engineering Judgment, which is more restrictive than Federal Effluent Guidelines. Therefore, the discharge is in conformance with the TMDL.

40 CFR 122.44(d)(1)(vii)(B) requires permits to be written with effluent limits necessary to meet water quality standards and to be consistent with the assumptions and requirements of applicable WLAs. DEQ has provided coverage under the VPDES Nutrient General Permit (GP) for this discharge under permits VAN030051 and VAN030133. The requirements of the Nutrient GP currently in effect for this facility are consistent with the Chesapeake Bay TMDL. This individual permit includes TSS limitations of 30 mg/L monthly average for the Doswell WWTP discharge and 50 mg/L monthly average for the Bear Island WWTP discharge that are also consistent with the Chesapeake Bay TMDL and WIP. In addition, the individual permit has limits of 30 mg/L BOD_5 monthly average for the Doswell WWTP discharge and 50 mg/L BOD_5 monthly average for the Bear Island discharge, 13.0 mg/L TKN monthly average, and 6.5 mg/L DO minimum which provide protection of instream D.O. concentrations to at least 5.0 mg/L. However, implementation of the full Chesapeake Bay WIP, including GP reductions combined with actions proposed in other source sectors, is expected to adequately address ambient conditions such that the proposed effluent limits of this individual permit are consistent with the Chesapeake Bay TMDL, and will not cause an impairment or observed violation of the standards for DO, chlorophyll a, or SAV as required by 9VAC25-260-185.

26. Summary of attachments to this Fact Sheet:

Attachment 1	Location maps
Attachment 2	Treatment and Water Flow Schematics for current condition
Attachment 3	Ambient Data on North Anna River
Attachment 4	Flow Frequency Memorandum
Attachment 5	Site inspection
Attachment 6	Effluent data
Attachment 7	Effluent Limitation Development for current condition
Attachment 8	WET Evaluation
Attachment 9	Development of control equations
Attachment 10	Lake Level Contingency Plan
Attachment 11	TKN degradability study
Attachment 12	Treatment and Water Flow Schematics for Bear Island expansion
Attachment 13	Development of control equation for the Bear Island expansion
Attachment 14	Effluent Limitation Development for the Bear Island expansion

TABLE I

Effluent Limitations for Doswell Wastewater Treatment Plant, VA0029521

Outfall 001 – Prior to Mill Expansion at Bear Island

PARAMETER	BASIS			PERMIT LIMIT				MONITORING REQUIREMENTS	
	EFFLUENT GUIDELINES	BEJ*	WATER QUALITY (1)	MONTHLY AVERAGE	WEEKLY AVERAGE	MINIMUM	MAXIMUM	FREQUENCY	SAMPLE TYPE
Flow of North Anna at gaging station above Little River	Monitoring of stream flow required to use equations I.A.1.c.(1) and I.A.1.f.(1)							Continuous	Recorded
Flow of North Anna at Route 30 gaging station								Continuous	Recorded
Effluent Flow	Monitoring only			NL	NL	NA	NL	Continuous	TIRE**
pH			1	NA	NA	6.0 SU	9.0 SU	1 / Day	Grab
BOD_5			2	Also see **Attachment 9**		NA	2393 kg/d	3 / Week	24 HC
TSS	√	√		Also see **Attachment 9**		NA	2393 kg/d	3 / Week	24 HC
Dissolved Oxygen			2	NA	NA	6.5 mg/L	NL	1 / Day	Grab
Total Kjeldahl Nitrogen			2	NL	13.0 mg/L	NA	NA	3 / Week	24 HC
Temperature (^oF)	Monitoring only			NL	NA	NA	NL	1 / Day	Immersion Stabilization
	Ambient stream temperature shall not be increased by more than 3 ^0C								
Also see attached supplement to this table									

* Best Engineering Judgment
** Totalizing, Indicating, and Recording Equipment
"NL" means that an effluent limitation has not been established. Monitoring and reporting however, are required.
"NA" means not applicable.
"24HC" means 24-hour composite.

(1) Key:
1. State Water Quality Standards, 9 VAC 25-260, effective February 12, 2004 with amendments effective January 12, 2006 and September 11, 2007.
2. Water Quality Standards based on wasteload allocation modeling – see attached supplement.

Outfall 001 – Supplement to Table 1

Flow

The Doswell Wastewater Treatment Plant is designed for 1.0 MGD monthly average.

The Bear Island flows have evolved as follows:

1. Original design flow of the wastewater treatment plant was 1.5 MGD.

2. WWTP upgraded to 2.88 MGD average and 3.45 MGD maximum to include wastewater from the sulfonation process (1987/88).

3. WWTP re-rated to 3.39 MGD average and 3.87 MGD maximum to accommodate an increase (“debottlenecking”) in the use of recycled pulp (October 1994).

4. By letter dated June 10, 2002, Bear Island requested a rerating of the hydraulic capacity of their wastewater treatment facility to 4.2 MGD average and 4.8 MGD daily maximum.

5. Proposed mill expansion will increase flows to 5.75 MGD average and 6.34 MGD maximum. These flows include the flow from the Doswell Wastewater Treatment Plant.

Control Equations

Attachment 9 contains memoranda dated June 19, 1978 and July 12, 1978 and hand-written notes dated May 21, 1985 that document the development of the initial control equation and modifications made in the permit reissued in 1988 permit.

Regarding the control equations for the current condition (i.e., pre Bear Island expansion) the following information is provided:

1. The initial control equation (1978) did not address water withdrawals. When the permit was modified in 1988 to first reflect a proposed expansion at Bear Island, the subtraction of a fixed water withdrawal of 10.85 cfs was incorporated into the equation (10.85 cfs was the total capacity of the Doswell Water Treatment Plant (WTP) and Bear Island river water intakes). With the reissuance of the permit in 1995, the fixed value of 10.85 cfs was replaced with a variable, Q_W, that still reflected the Doswell WTP and Bear island intakes only. In 2003, Q_W was replaced with a specifically identified withdrawal variable – Q_{BIPCO} – and a fixed value of 2.6 cfs reflecting two water withdrawals – Paramount’s Kings Dominion and Engel Farm – that were not previously incorporated into the equation. The withdrawal for the Doswell Water Treatment Plant was taken out of the equation because that withdrawal was reflected in the river gage reading at Route 30 (i.e., the previous permits double counted the withdrawal at the water plant). The equation was further modified to include another variable, Q_{PLAN}, which was an addition to the flow used in the calculation. Q_{PLAN} was the reduction (below 40

cfs) in the Lake Anna dam release during implementation of the Lake Level Contingency Plan (see **Attachment 10**). Also, a second control equation was developed for a gaging station to be located on the North Anna River above the Little River. The Lake Level Contingency Plan allows Dominion Power to reduce the guaranteed water release rate from Lake Anna when low water levels in the lake threaten operation of the power station (see additional information below regarding the Lake Level Contingency Plan). By regulation however, implementation of the Plan is not to impact downstream riparian owners. Q_{PLAN} therefore, was added to the flows in the equation in order to prevent impact (i.e., a lower calculated effluent limitation). The Plan also provides for returning the release rate to 40 cfs if downstream water quality problems are noted.

2. Water withdrawals are as follow:

   a. Bear Island has a withdrawal capacity of 4.0 MGD. (Note that this value of 4.0 MGD differs from the value in Attachment 2, which shows a withdrawal of up to 6.5 MGD. The capacity of the existing pumps however, is 4.0 MGD.)

   b. Engel Farms withdraws water from the North Anna to irrigate approximately 420 acres of farmland. A total of 5.0 MGD can be withdrawn – 2.2 MGD from intakes above Route 30 for irrigation of 190 acres of farm land, and 2.8 MGD below Route 30 for 230 acres. (This information on the withdrawal capacities of Engel Farms was obtained from a telephone conversation with Kevin Engel.) Pumping however, would have to continue for 24 consecutive hours, which is unlikely, in order to reach those capacities. A more reasonable assessment of the actual withdrawal amount was to assume an irrigation rate of 1 inch per acre per week. For the 190 acres above Route 30, that results in a daily withdrawal of 0.74 MGD. For the 230 acres below Route 30 the result is 0.89 MGD.

   c. Paramount Kings Dominion has a withdrawal capacity of approximately 0.8 MGD below Route 30 for non-potable uses in the park. When the Park is preparing in early March to open for the season, water is continuously pumped from the river to fill water attractions.

   d. The withdrawal for the Doswell Water Treatment Plant is 4.0 MGD (but is no longer a subtraction in any control).

3. The Kings Dominion withdrawal of 0.8 MGD and the Engel Farm withdrawal of 0.89 MGD below Route 30 must be subtracted from the gage reading at Route 30 in the control equation at I.A.1.f.(1). 0.8 + 0.89 = 1.69 MGD, or 2.6 cfs.

4. In the 2013 permit Q_{PLAN} has been removed from the equation in Part I.A.1.f.(1). Q_{PLAN} was removed because use of the equation is no longer forced to the low stream flows where Q_{PLAN} becomes a significant issue – see discussion in item 5 below.

5. Part I.A.1.f.(2) (previously I.A.1.c.(3)) establishes a lower limit on the applicability of the control equation when the Route 30 gaging station is used. This is

consistent with all permits, which base BOD_5 (and $CBOD_5$) effluent limitations on the 7Q10 of the receiving stream. The minimum low flow to be used in the equation was established in the 2006 permit by subtracting all withdrawals from the 7Q10 flow in an attempt to establish the actual flow that had a return frequency of 7 consecutive days every 10 years. In hindsight, subtracting the withdrawals did not technically accomplish that, but it did introduce some conservatism to counterbalance the altered return frequency created by the controlled release of water from Lake Anna. With this reissuance (2009), data at both the gaging stations at Route 30 and at the North Anna above the Little River (using regression analysis) have been evaluated to establish theoretical low flows at those locations. The 7Q10 flow at the Route 30 gaging station is 39 cfs. (Note that the 7Q10 of the Little River is no longer added to the North Anna low flows to determine flows at the outfall.) The 2013 permit therefore, indicates 39 cfs as the low flow to which the equation is applicable (compared to 35.66 cfs in the 2006 permit). Q_{PLAN} has been deleted because use of the equation is no longer forced to the low stream flows where Q_{PLAN} becomes a significant issue.

6. In the 2013 permit, Q_{PLAN} has been removed from the equation in Part I.A.1.c.(1). Q_{PLAN} was removed because use of the equation is no longer forced to the low stream flows where Q_{PLAN} becomes a significant issue – see discussion in item 7 below.

7. Part I.A.1.c.(3) establishes a lower limit on the applicability of the control equation for the gaging station on the North Anna above the Little River (which is now the normal condition). The 7Q10 at that location was determined to be 45 cfs using data from both gages and regression analysis. The 2013 permit therefore, indicates 45 cfs as the low flow to which the equation is applicable (compared to 26.86 cfs in the 2006 permit after subtracting all upstream withdrawals; see discussion above). Q_{PLAN} was deleted because use of the equation is no longer forced to the low stream flows where Q_{PLAN} becomes a significant issue.

<u>BOD and TKN Loadings at 7Q10 Stream Flow</u>

The York River Basin 303(e) Water Quality Management Plan (WQMP) allocates at 7Q10 stream flow an ultimate biochemical oxygen demand (BOD) of 1,125 pounds per day to the Doswell discharge (including the Bear Island discharge). 690 pounds per day of that allocation is $cBOD_5$.

The 1995 permit and previous permits that addressed Bear Island contained a specific statement limiting discharge at 7Q10 to 690 pounds per day BOD_5. The 2006 permit does not explicitly contain that restriction because the control equations in that permit generate loadings less than 690 at the adjusted stream flows which are used in the equations (i.e., when upstream withdrawals are subtracted from stream gage readings). With the development of actual 7Q10 flows at the two gaging stations however (see discussion above – Control Equations, #5), the calculated loadings at 7Q10 exceed 690 pounds per day (312 kg/d). It is necessary therefore, to reestablish this limitation.

The permit has not previously addressed TKN loading at 7Q10, which represents the nitrogenous portion of the ultimate BOD allocation. For similar reasons that apply to reestablishing the 690 pound per day BOD5 limitation, it is necessary to limit, at 7Q10, nitrogenous demand via a TKN loading limitation. A limitation of 507 pounds per day (229 kg/d) was developed as follows: The York River 303(e) Plan assigns a percentage of ultimate nitrogenous demand to each segment of the basin reflecting the percentage of discharged nitrogen that is expected to remain once it reaches tidal waters and exert a demand. Twenty-five (25) percent is the value assigned to "headwaters". (The other designated waters are "Tidal/Non-Tidal Interface" and "Tidal".) The Plan also defines ultimate BOD_5 as $BOD_5 \div 0.8$. The TKN loading limitation at 7Q10 therefore, is as follows:

> 1125 – (690 ÷ 0.8) = 262.5 pounds per day nitrogenous demand
>
> 262.5 ÷ 4.5 (conversion factor) = 58.333 pounds per day TKN
>
> 58.333 x 4 ("headwaters" percentage) ÷ 0.46 (see TKN discussion below) = 507.2 pounds per day, which will be written in the permit as 507 pounds per day (229 kg/d).

BOD and TSS Daily Maximum Limitations

A decision was made when control equations were first included in the permit to put a cap on the BOD and TSS that could be discharged so that the permit would not be completely open-ended in regard to the quantities of those pollutants that could be discharged. A maximum (or cap) is also needed to insure compliance with the Federal effluent guidelines that apply to Bear Island – see "Outfall 201 – Supplement to Table III". The calculation of 5,275 pounds per day is based on an earlier version of the control equation with inputs of an effluent flow of 4.45 MGD (1.0 MGD for the Doswell sewage treatment plant and 3.45 MGD daily maximum for Bear Island; see section titled Flow above) and a stream flow of 300 cfs. The value of 5,275 pounds per day remains an appropriate cap regardless of subsequent changes in design flow. The TSS cap was set at the same value as the BOD_5 cap.

TKN

The original modeling that was used to establish the control equation assumed a TKN concentration of 6 mg/L. The information presented in **Attachment 11** indicates that only 46% of the TKN decomposes and exerts an oxygen demand. The limitation of 13 mg/L reflects this percentage (i.e., 6 ÷ 0.46 = 13). The 1995 permit required that this degradation study be repeated to determine if the addition of recycled paper facilities altered the percentage of decomposition. That study confirmed that 46% conservatively establishes the percentage of decomposition. Therefore, the 2006 permit and the 2013 permit maintain the limitation of 13 mg/L as a weekly average.

The TKN limitation of 13 mg/L effectively limits ammonia to concentrations below toxic levels. See STATS printout for ammonia in Attachment 7.

Temperature

From Attachment 6B, Outfall 001 effluent temperatures (July 2005 through June 2008) are as follow:

- 36°C (maximum)
- 34°C (90^{th} percentile maximum)
- 30.6°C (90^{th} percentile average)
- 27°C (90^{th} percentile minimum)

From Attachment 3, ambient stream temperatures (January 1979 through March 2008) are as follow:

- 0.5°C (minimum)
- 5.5°C. (10^{th} percentile)

The North Anna Lake Contingency Plan is triggered at stream flows less than 40 cfs and design effluent flow is 5.8 MGD (9.0 cfs).

From the attached spreadsheet titled "North Anna River Delta Ts" of actual delta Ts calculated from January 2006 through November 2008, the following observations are noted:

- Emphasis should be given to conditions occurring in the late Fall and Winter when ambient stream temperatures are cool, and stream flows are low. Based on the historic stream data, there are Fall/Winter cool temperature dates where flows approached the Lake Contingency Plan flow threshold. It would thus appear appropriate to use annual or lake contingency low flows, rather than winter tier high flows, in analyzing "worse-case" permitting design conditions.

- The attached spreadsheet indicates that exceedances of the delta 3°C standard may have occurred on two dates, 11/26/07 and 11/27/07. On those dates, the potential delta T was calculated to be 4.67 and 5.01°C, respectively. Those data confirm the reasonable potential for the delta T of 3°C to be exceeded *in the field.*

Manipulating the worksheets confirmed some scenarios at flows greater than 40 cfs that would result in delta temperatures greater than 3°C. Using data from February 5, 2002, North Anna flows were 46.4 cfs with an ambient stream temperature of 3.36°C. At a design effluent flow of 9 cfs, and using the 90^{th} percentile minimum value of 27°C, the predicted delta T would be 3.84°C. Using the more conservative 90^{th} percentile maximum value, the predicted delta T would be 4.98°C.

Repeating the above steps using more recent stream data (November 12, 2008 @ 60 cfs and 10°C) coupled with design effluent data (flow of 9 cfs and 90% max temp of 34°C) would result in a predicted delta T of 3.13°C.

Using lake contingency flows (40 cfs), 10^{th} percentile stream temperature (5.5°C), effluent design flow (9 cfs), and 90% max effluent temp (34°C) would result in a predicted "worse case" design-condition delta T of 5.23°C.

Given the November 2007 historical cases, the hybrid scenarios outlined above (using historical stream data with effluent design data), and the permitting design condition (design stream data with effluent design data), there appears to be several scenarios for a reasonable potential to exist where stream temperatures may rise more than 3°C due to the heated Doswell discharge. It is therefore, appropriate to limit the instream temperature change (delta T) to 3 ^{0}C in the permit.

A compliance schedule is not needed in regard to meeting this delta T requirement because of the cooling that can be achieved in the effluent holding pond.

Lake Level Contingency Plan

The VPDES permit issued to the North Anna Nuclear Power Station contains a Lake Level Contingency Plan as required by §62.1-44.15:1.2 of the Code of Virginia, adopted in 2000. See Attachment 10. Dominion Virginia Power was previously required to release a minimum of 40 cfs from Lake Anna. That 40 cfs is included in the calculation of the statistical low flows. The Lake Level Contingency Plan however, allows Dominion Virginia Power to reduce the release from the lake to 20 cfs under specified conditions. If any downstream user identifies an adverse impact during such low flow conditions however, that impact is to be reported to the DEQ and the Director of DEQ is to decide if the release rate should be returned to 40 cfs. It is the intent of this legislation that downstream users not be burdened as a result of implementing the Contingency Plan.

TABLE II

Effluent Limitations for Outfall 101 – Discharge from the Doswell Wastewater Treatment Plant

PARAMETER	BASIS			PERMIT LIMIT				MONITORING REQUIREMENTS	
	EFFLUENT GUIDELINES	BEJ*	WATER QUALITY (1)	MONTHLY AVERAGE	WEEKLY AVERAGE	MINIMUM	MAXIMUM	FREQUENCY	SAMPLE TYPE
Flow	Monitoring only			NL	NL	NA	NL	Continuous	TIRE
BOD_5	√			30 mg/L	45 mg/L	NA	NA	1 / Week	24 HC
TSS	√			30 mg/L	45 mg/L	NA	NA	1 / Week	24 HC
E. coli (n/100ml)			1	126**	NA	NA	NL	3 Days / Week	Grab
Total Kjeldahl Nitrogen	Monitoring only			NL	NL	NA	NA	1 / Month	24 HC
The permit also requires 85% removal of BOD_5 and TSS.									

* Best Engineering Judgment
** Geometric mean
"NL" means that an effluent limitation has not been established. Monitoring and reporting however, are required.
"NA" means not applicable.
"24HC" means 24-hour composite.

(1) Key: 1. State Water Quality Standards, 9 VAC 25-260, effective February 12, 2004 with amendments effective January 12, 2006 and September 11, 2007.

TABLE III

Effluent Limitations for Outfall 201 – Discharge from the Bear Island Wastewater Treatment Plant

PARAMETER	BASIS			PERMIT LIMIT				MONITORING REQUIREMENTS	
	EFFLUENT GUIDELINES	BEJ*	WATER QUALITY	MONTHLY AVERAGE	WEEKLY AVERAGE	MINIMUM	MAXIMUM	FREQUENCY	SAMPLE TYPE
Flow	Monitoring only			NL	NL	NA	NL	Continuous	TIRE
BOD_5	Monitoring only			NL	NL	NA	NA	1 / Week	24 HC
TSS	Monitoring only			NL	NL	NA	NA	1 / Week	24 HC
Total Kjeldahl Nitrogen	Monitoring only			NL	NL	NA	NA	2 / Month	24 HC
Also see attached supplement to this table									

* Best Engineering Judgment
“NL” means that an effluent limitation has not been established. Monitoring and reporting however, are required.
“NA” means not applicable.
“24HC” means 24-hour composite.

Outfall 201 – Supplement to Table III

Comparison of effluent limitations in 2013 permit to limitations in Federal Effluent Guidelines

Bear Island has certified (by letter dated July 8, 2008) that they do not use zinc hydrosulfite for bleaching or chlorophenolic-containing biocides. Therefore, limitations for **zinc**, **pentachlorophenol**, and **trichlorophenol** as contained in the Guidelines are not required.

BOD_5 and TSS

Bear Island reported the following quantities that are representative of actual production levels: 410 tons per day of thermo-mechanical pulp (which includes 50 tons per day of purchased Kraft pulp) and 300 tons per day of recycled pulp. Thermo-mechanical pulping is addressed by Subpart M of the guidelines and recycled pulp is addressed by Subpart Q – Deink Subcategory.

From Federal Guidelines (numbers expressed as pounds per 1000 pounds of production):

	30-day Average	Daily Maximum
Thermo-mechanical Subcategory – 40 CFR Part 430.132, Subpart M, BPT		
BOD_5	5.55	10.6
TSS	8.35	15.55
Deink Subcategory – 40 CFR Part 430.175, Subpart Q, NSPS*, newsprint		
BOD_5	3.2	6.0
TSS	6.3	12.0

* Recycled pulp added to process after promulgation of guidelines.

Calculation of effluent limitation

BOD_5: Average = $[(410 \times 2000) \div 1000] \times 5.55 + [(300 \times 2000) \div 1000] \times 3.2$
= 6,471 pounds per day

Maximum = 12,292 pounds per day

TSS: Average = 10,627 pounds per day

Maximum = 19,951 pounds per day

The control equations limit BOD_5 (prior to mill expansion), $CBOD_5$ (following mill expansion), and TSS to levels below the above guideline values. The permitted maximum for BOD_5, $CBOD_5$, and TSS is 5275 pounds per day regardless of stream flow.
.

TABLE IV

Effluent Limitations for Doswell Wastewater Treatment Plant, VA0004669
Outfall 001 – After Mill Expansion at Bear Island

PARAMETER	BASIS			PERMIT LIMIT				MONITORING REQUIREMENTS	
	EFFLUENT GUIDELINES	BEJ*	WATER QUALITY (1)	MONTHLY AVERAGE	WEEKLY AVERAGE	MINIMUM	MAXIMUM	FREQUENCY	SAMPLE TYPE
Flow of North Anna at gaging station above Little River	Monitoring of stream flow required to use equation I.A.4.c.(1) and I.A.4.h.(1).							Continuous	Recorded
Flow of North Anna at Route 30 gaging station								Continuous	Recorded
Effluent Flow	Monitoring only			NL	NL	NA	NL	Continuous	TIRE
pH			1	NA	NA	6.0 SU	9.0 SU	1 / Day	Grab
$CBOD_5$ (also see **Attachment 13**)	√		2	NL	30 mg/L	NA	2393 kg/d	1 / Day	24 HC
TSS (also see **Attachment 13**)		√		NL	50 mg/L	NA	2393 kg/d	1 / Day	24 HC
Dissolved Oxygen									
Cascade Aeration			2	NA	NA	6.5 mg/L	NL	1 / Day	Grab
Pure Oxygen			2	See **Attachment 13**				Continuous	Measured
Total Kjeldahl Nitrogen**			2	NL	10.0 mg/L	NA	NA	1 / Day	24 HC
Temperature (^oF)			1	NL	NA	NA	90	1 / Day	Immersion Stabilization
	Ambient stream temperature shall not be increased by more than 3 ^0C								
Also see attached supplement to this table									

* Best Engineering Judgment
** Also see **Attachment 13**
"NL" means that an effluent limitation has not been established. Monitoring and reporting however, are required.
"NA" means not applicable.
"24HC" means 24-hour composite.

(1) Key:
1. State Water Quality Standards, 9 VAC 25-260, effective February 12, 2004 with amendments effective January 12, 2006 and September 11, 2007.
2. Wasteload allocation modeling

Outfall 001 – Supplement to Table IV

Control Equation

See Attachment 13.

The lower limit on stream flow to be used in the control equation has been revised from 22.22 cfs to 45 cfs (Part I.A.4.c.(2)). The 7Q10 at that location was determined to be 45 cfs using data from the Route 30 gaging station, the gaging station on the North Anna River above the Little River gaging stations, and regression analysis. The 2013 permit therefore, indicates 45 cfs as the low flow to which the equation is applicable.

Temperature

The BIPCo discharge contains heat – see Attachment 6B for temperature data at Outfall 001.

A daily maximum temperature of 90 ^{0}F (32 ^{0}C) will be continued from the 2006 permit.

As discussed in the Supplement to Table 1, it is also appropriate to limit the instream temperature change (delta T) to 3 ^{0}C.

Table V
Permit Processing Change Sheet

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Cover Page	Formatting revised in accordance with new templates – wording changes in first paragraph and “City: NA” was deleted					New guidance
Part I.A.1.a Outfall 001	Added “whichever occurs first” in the first sentence of I.A.1 in regard to the expansion at Bear Island or permit expiration.					Clarity
	Included separate lines for each gaging station for river flow measurement. Frequency and Sample Type for river flows specified as “Continuous” and “Recorded”, respectively. Special Condition I.B.4 now referenced in a footnote.					The gaging station above the Little River is now the primary location to determine river flow. Use of Route 30 gaging station included as back-up. See item 19.d for discussion of frequency and sample type.
	“Effluent” added to flow at Outfall 001. Sample Type for effluent flow changed from “Recorded” to “Totalizing, Indicating, and Recording Equipment” (TIRE).					“Effluent” added for clarity. TIRE more accurate and consistent with guidance.
	BOD_5	1 / Day	3 / Week	No Change	No Change	Performance based reduction in monitoring frequency. Also see discussion in item 19.y of fact sheet.
	BOD_5 and TSS daily maximums of 2393 kg/d added to Part I.A.1 These loadings are also included at I.A.1.c.(4) and I.A.1.d.(2), respectively. Previous permits established these limitations only in conjunction with the control equations. The loadings have been revised from 2394 kg/d to 2393 kg/d.					Permit formatting has changed over the years. These limitations are daily maximums. The change from 2394 to 2393 is a function of the number of decimal places to which the conversion factor is carried. 2393 is consistent with the instruction added at I.A.4.b.(1) – see below.

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Part I.A.1.a Outfall 001 (cont'd)	Total Nitrogen and Total Phosphorus	Monitoring requirement deleted. Definition of Total Nitrogen deleted.				Monitoring and reporting now required by general permit VAN030051, which is referenced in the permit. See I.A.1.g below.
	Ammonia	Monitoring requirement deleted.				Ammonia limitations are not indicated – see Attachment 7. Also see Attachment 6B for actual ammonia concentrations in effluent.
Part I.A.1.c Outfall 001	In first sentence, "daily" deleted from phrase "The average of <u>daily</u> BOD_5 values over a calendar week …" The control equation using the gaging station above the Little River (previously I.A.1.f) was moved to I.A.1.c.(1) Seven samples per week was changed to "n" in response to reduced monitoring and to reflect whatever the number of samples collected during a week to compute the weekly average. Q_{PLAN} was deleted. The minimum low flow to which the equation is applicable in I.A.1.c.(3) for the gaging station above the Little River was revised from 26.86 cfs to 45 cfs. (Note that the theoretical low flow no longer includes the Little River.) "[A]t Outfall 001" added to definition of Q_E for clarity. In Part I.A.1.c.(2), seven samples per week was changed to "n" in response to reduced monitoring and to reflect whatever the number of samples collected during a week to compute the weekly average. In I.A.1.c.(3), the correct reporting form is Attachment A versus the DMR as indicated in the 2006 permit. Also, a second paragraph has been added to I.A.1.c.(3) establishing maximum BOD_5 and TKN loadings at 7Q10 stream flow. See "Outfall 001 – Supplement to Table I" for an explanation of these maximum loadings. In I.A.1.c.(4), 2394 kg/d changed to 2393 kg/d – see discussion above regarding I.A.1.a.					With reduction in monitoring frequency, daily values will not be determined. The gaging station above the Little River is now the primary location to determine river flow. Low flow revised in accordance with Attachment 4. Also see the Supplement to Table I.

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Part I.A.1.d.(1) Outfall 001	The averaging period was changed from 3 to “n” days, and the associated footnote was deleted. This change was made to reflect whatever the number of samples that are collected during a week to compute the weekly average. Typographical error corrected in legend – the first item is $\mathbf{L_W}$ = effluent TSS concentration ...					Part I.A.1.d.(1) Outfall 001
Part I.A.1.e. Outfall 001	Added the word “monitored” to “A calendar week average shall be calculated by determining each <u>monitored</u> day’s BOD_5 and TSS ... .”					Clarity
Part I.A.1.f Outfall 001	The control equation for use of the Route 30 gaging station was moved from I.A.1.c.(1) in the 2006 permit to I.A.1.f.(1) for use as a back-up monitoring location if necessary. The language preceding the equation was rewritten to reflect that alternative. Seven samples per week was changed to “n” in response to reduced monitoring and to reflect whatever the number of samples collected during a week to compute the weekly average. Q_{PLAN} was deleted. Part I.A.1.f.(2), which is similar to Part I.A.1.c. (3) in the 2006 permit, establishes the minimum low flow that is to be used in the equation. That low flow has been revised from 35.66 cfs to 39 cfs. (Note that the theoretical low flow no longer includes the Little River.) In I.A.1.f.(2), the correct reporting form is Attachment A versus the DMR as indicated in Part I.A.1.c. (3) of the 2006 permit. I.A.1.f.(3) has been added to establish maximum BOD_5 and TKN loadings at 7Q10 stream flow. See “Outfall 001 – Supplement to Table I” for an explanation of these maximum loadings.					See Supplement to Table I.
Part I.A.1.g Outfall 001	Reference to coverage under the general permit issued in accordance with 9 VAC 25-820, “General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Watershed in Virginia”, was added.					Guidance Memorandum No. 07-2008 and amendments
Part I.A.1.h Outfall 001	Added requirement to the permit that the discharge cannot cause an increase in stream temperature of more than 3 ^{0}C.					VA Water Quality Standards
Part I.A.2 Outfall 101	Sample Type for effluent flow changed from “Recorded” to “Totalizing, Indicating, and Recording Equipment” (TIRE).					TIRE more accurate and consistent with guidance.

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Part I.A.2 Outfall 101 (cont'd)	BOD_5	5 Days / Week	1 / Week	NA	NA	Performance based reduction in monitoring frequency. Also see discussion in item 19.y of fact sheet.
	TSS	3 Days / Week	1 / Week	NA	NA	
	Fecal Coliform limitation replaced with *E. coli* limitation of 126 n/100 mL as a monthly geometric mean.					Water Quality Standards were revised to address *E. coli*
	Significant figures footnote added for BOD_5 and TSS monthly average limitations					Guidance Memorandum No. 06-2016
	Total Phosphorus and ammonia monitoring deleted.					See rationale above for I.A.1.a
	I.A.2.c was added to reference to coverage under the general permit issued in accordance with 9 VAC 25-820, "General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Watershed in Virginia".					Guidance Memorandum No. 07-2008 and amendments
Part I.A.3 Outfall 201	Added "whichever occurs first" in the first sentence of I.A.1 in regard to the expansion at Bear Island or permit expiration.					Clarity
	Sample Type for effluent flow changed from "Recorded" to "Totalizing, Indicating, and Recording Equipment" (TIRE).					TIRE more accurate and consistent with guidance.
	BOD_5	5 Days / Week	1 / Week	NA	NA	Performance based reduction in monitoring frequency. Also see discussion for in item 19.y of fact sheet.
	TSS	3 Days / Week	1 / Week	NA	NA	
	Total Phosphorus and Ammonia	Monitoring requirement deleted.				See rationale above for I.A.1.a
	I.A.3.b was added to reference to coverage under the general permit issued in accordance with 9 VAC 25-820, "General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Watershed in Virginia".					Guidance Memorandum No. 07-2008 and amendments

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Part I.A.4.a Outfall 001 after mill expansion	Identification of gaging station changed from “in the vicinity immediately upstream of Outfall 001” to “above Little River near Doswell”. Added footnote (2) to frequency and sample type for this gage.					Identification is consistent with USGS identification. Recognizes addition of the Route 30 gaging station as a back-up.
	Added line for flow measurement at the Route 30 gaging station. Frequency and Sample Type specified as “Continuous” and “Recorded”, respectively. Special Condition I.B.4 referenced as a footnote.					Route 30 gaging station added as a back-up. See item 19.d for discussion of frequency and sample type.
	“Effluent” added to flow from at Outfall 001					Clarity
	Sample Type for effluent flow changed from “Recorded” to “Totalizing, Indicating, and Recording Equipment” (TIRE).					TIRE more accurate and consistent with guidance.
	$CBOD_5$ and TSS daily maximums of 2393 kg/d added to Part I.A.4 These loadings are also included at I.A.4.c.(3) and I.A.4.d, respectively. Previous permits established these limitations only in conjunction with the control equations. The loadings have been revised from 2394 kg/d to 2393 kg/d. In the column for TSS weekly average kg/d, “See A.4.d” has been replaced with “NL”.					Permit formatting has changed over the years. These limitations are daily maximums. The change from 2394 to 2393 is a function of the number of decimal places to which the conversion factor is carried. 2393 is consistent with the instruction added at I.A.4.b.(1) – see below. There is no weekly average TSS loading limitation.
	Total Nitrogen and Total Phosphorus	Monitoring requirement deleted. Definition of Total Nitrogen deleted.				Monitoring and reporting now required by general permit VAN030051, which is referenced in the permit. See I.A.4.g below.
	Ammonia	Monitoring deleted.				See rationale above for I.A.1.a

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Part I.A.4.c.(1) Outfall 001	In definition of L, added instructions for conversion of pounds per day to kg/d. Q_S revised to Q_{GAGE}.					Instruction for consistency of calculations. Terminology consistent throughout permit.
Part I.A.4.c.(2) Outfall 001	The minimum low flow to which the equation is applicable in I.A.1.c.(3) for the gaging station above the Little River was revised from 22.22 cfs to 45 cfs. The correct reporting form is Attachment A versus the DMR as indicated in the 2006 permit. A second paragraph has been added to establish maximum $CBOD_5$ and TKN loadings at 7Q10 stream flow. See "Outfall 001 – Supplement to Table I" for an explanation of these maximum loadings.					See Attachment 4 and Supplement to Table IV regarding the revision to stream flow.
Part I.A.4.c.(3) Outfall 001	2394 kg/d changed to 2393 kg/d – see discussion above regarding I.A.4.a.					
Part I.A.4.d Outfall 001	2394 kg/d changed to 2393 kg/d – see discussion above regarding I.A.4.a.					
Part I.A.4.g Outfall 001	Reference to coverage under the general permit issued in accordance with 9 VAC 25-820, "General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Watershed in Virginia", was added.					Guidance Memorandum No. 07-2008 and amendments
Part I.A.4.h Outfall 001	Added to permit to establish use of the Route 30 gaging station as a back-up to the gaging station above the Little River.					
Part I.A.4.i Outfall 001	Added requirement to the permit that the discharge cannot cause an increase in stream temperature of more than 3 ^{0}C.					VA Water Quality Standards
Part I.B. 2006 permit	Part I.B in the 2006 permit required water quality criteria monitoring on existing Outfall 001 for submittal with the permit renewal application. That requirement has been deleted.					This instruction is now included in the permit "reminder letter" advising the permittee of application requirements.
Part I.B. 2013 permit	In the 2013 permit, special conditions are addressed in Part I.B. See item 19 in fact sheet for discussion of changes to the special conditions.					

OUTFALL NO.	PARAMETER CHANGED	MONITORING CHANGED		EFFLUENT LIMITS CHANGED		RATIONALE
		FROM	TO	FROM	TO	
Part I.C.	Special Conditions were addressed in Part I.C in the 2006 permit. Special Conditions are addressed in Part I.B of the 2013 permit. Part I.C in the 2013 permit requires water quality criteria monitoring at Outfall 001 after expansion of the BIPCo mill. This attachment has been updated.					
Part I.D 2006 permit	Part I.D in the 2006 permit contained a compliance schedule for constructing a river gaging station in the North Anna River above the Little River. That schedule has been deleted. (In the permit that was reissued in 2003 Part I.D also contained a compliance schedule for cyanide limitations. The cyanide limitations were removed by permit modification in 2006.)					The gaging station was constructed in accordance with the schedule.
CHANGES IN RESPONSE TO OWNER COMMENT (revisions made May 27 2009)						
Part I.A.4.c.(2), second paragraph, was revised to reference $CBOD_5$ versus BOD_5. This was a staff oversight; $CBOD_5$ should have been initially cited. In Part I.A.4.h.(2), a second paragraph was added to establish the maximum $CBOD_5$ and TKN loadings at 7Q10 flow at the Route 30 gage. Special Condition I.B.5 was revised to include a low flow exclusion.						

DEQ STAFF INITIATED CHANGES – June 3, 2010

1. Item 24.c in this fact sheet states that DEQ staff intends to review the dissolved oxygen modeling and the control equations contained in this permit with the intent to replace the control equations with fixed, seasonal tiered, effluent limitations. Toward that end, special condition I.B.30 was added to the draft permit. That condition requires the permittee to develop a calibrated and verified model for use in establishing effluent limitations. The proposed special condition also requires that the Doswell WWTP and Bear Island discharges be modeled as separate and combined discharges.

2. As DEQ has updated some of the routinely used special conditions since the previous draft of the permit was reviewed, several special conditions were revised as follows:

   a. The wording of special conditions 21, 24, 25, and 26 was updated to reflect the most recent agency guidance. The citation in 25.e was also corrected to I.B.26 versus I.B.27.

   b. Special Condition 28 (of 30 total special conditions) in the previous draft required radionuclide testing. That special condition was deleted because the radionuclide standards now only apply to waters designated as public water supplies. This change prompts renumbering of the two special conditions that follow the deleted condition, and the new condition described above regarding stream modeling is therefore, special condition 30.

   c. Part I.C of the permit was updated to reflect the revised Virginia Water Quality Standards that became effective on February 1, 2010 as follows: The selenium standard is for the total recoverable form, versus dissolved. The cyanide standard is for free cyanide, versus total. Diazinon, carbon tetrachloride, and nonylphenol were added. The specific PCB arochlors 1260, 1254, 1248, 1242, 1232, 1221, and 1016; radionuclide testing; and Foaming Agents (as MBAS) were deleted. Also, the Special Composite (SC) designation for Pesticide/PCBs, Base Neutrals, Acids, and hydrogen sulfide was deleted and replaced with Composite (C) to be consistent with current guidance.

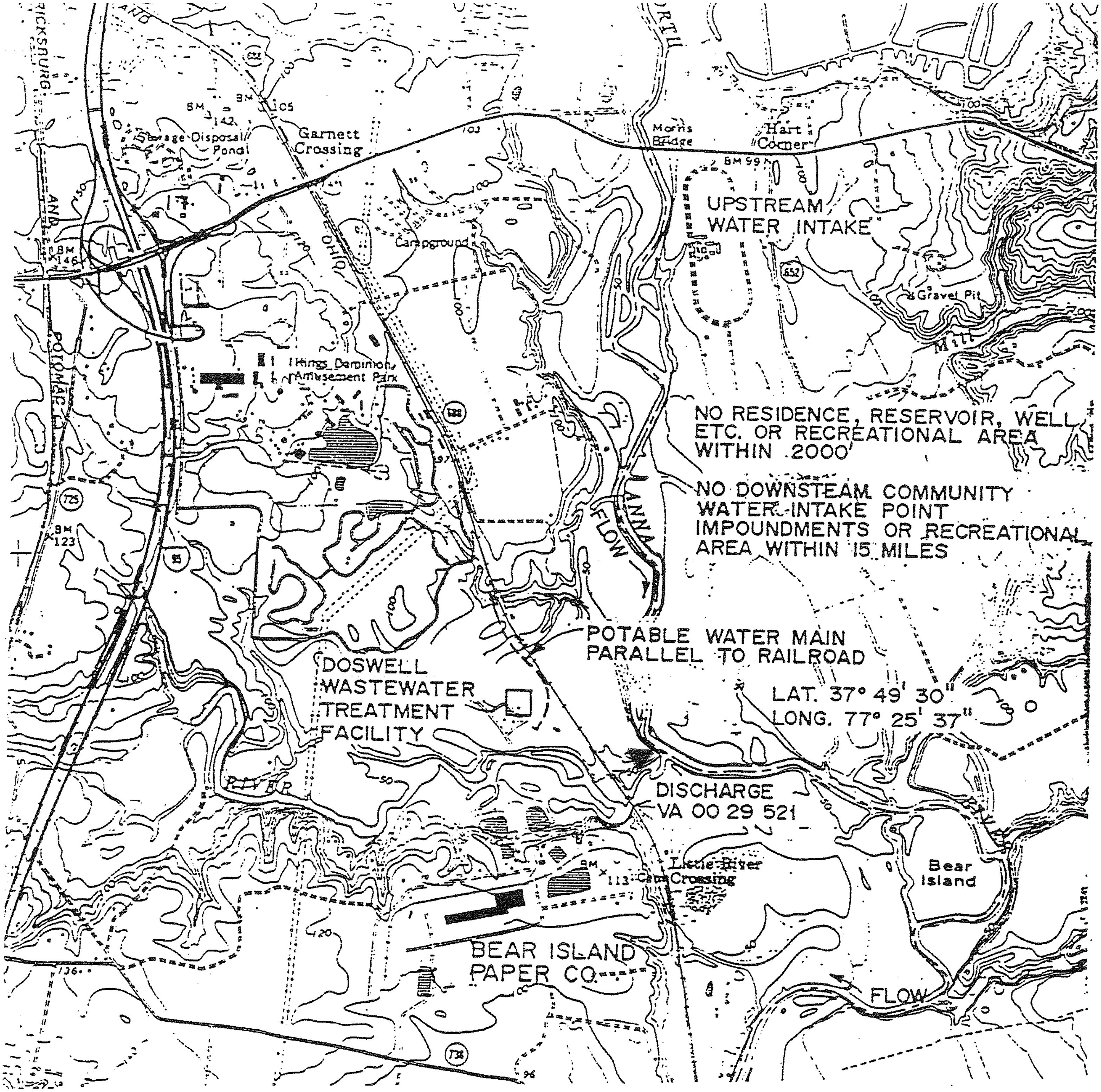
DEQ STAFF INITIATED CHANGES – May 17, 2011

Special Condition I.B.30 (see item 1 immediately above) was revised. The permittee is no longer required to develop a calibrated and verified model, but has that option in lieu of relying on DEQ modeling.

Attachment 1

1. First map identifies outfall location

2. Second map more clearly shows receiving stream. Outfall location is immediately below cross section B. The cross sections designate approximate sampling locations for the dissolved oxygen monitoring required by the permit.



SCALE: 1:24000

1 1/2 0 1 mile

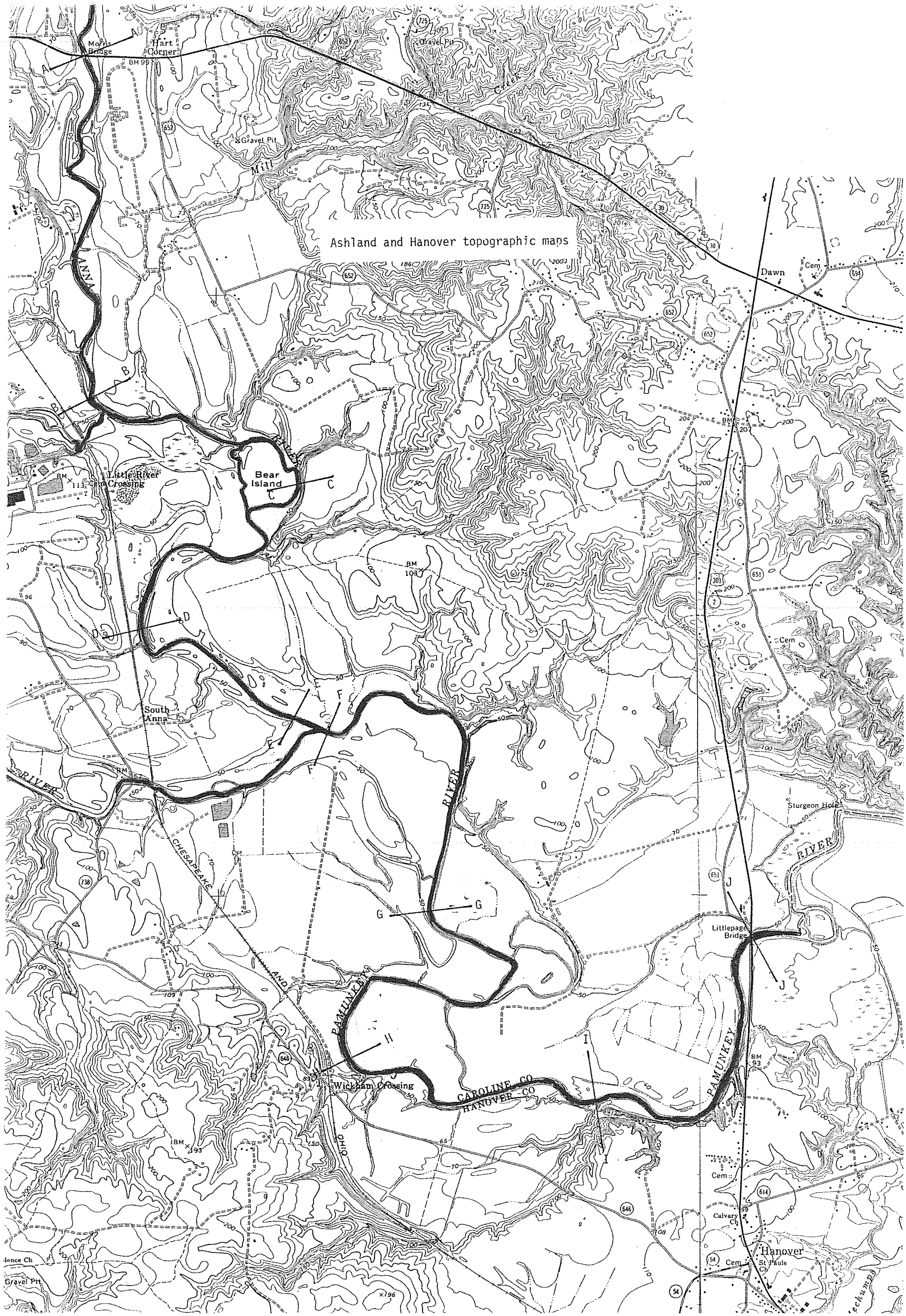
1000 0 1000 2000 3000 4000 5000 6000 7000 ft.

N

Figure 1
SITE LOCATION MAP

TAKEN FROM USGS MAP
ASHLAND QUADRANGLE,
PHOTOREVISED 1985

AWARE ENVIRONMENTAL INC

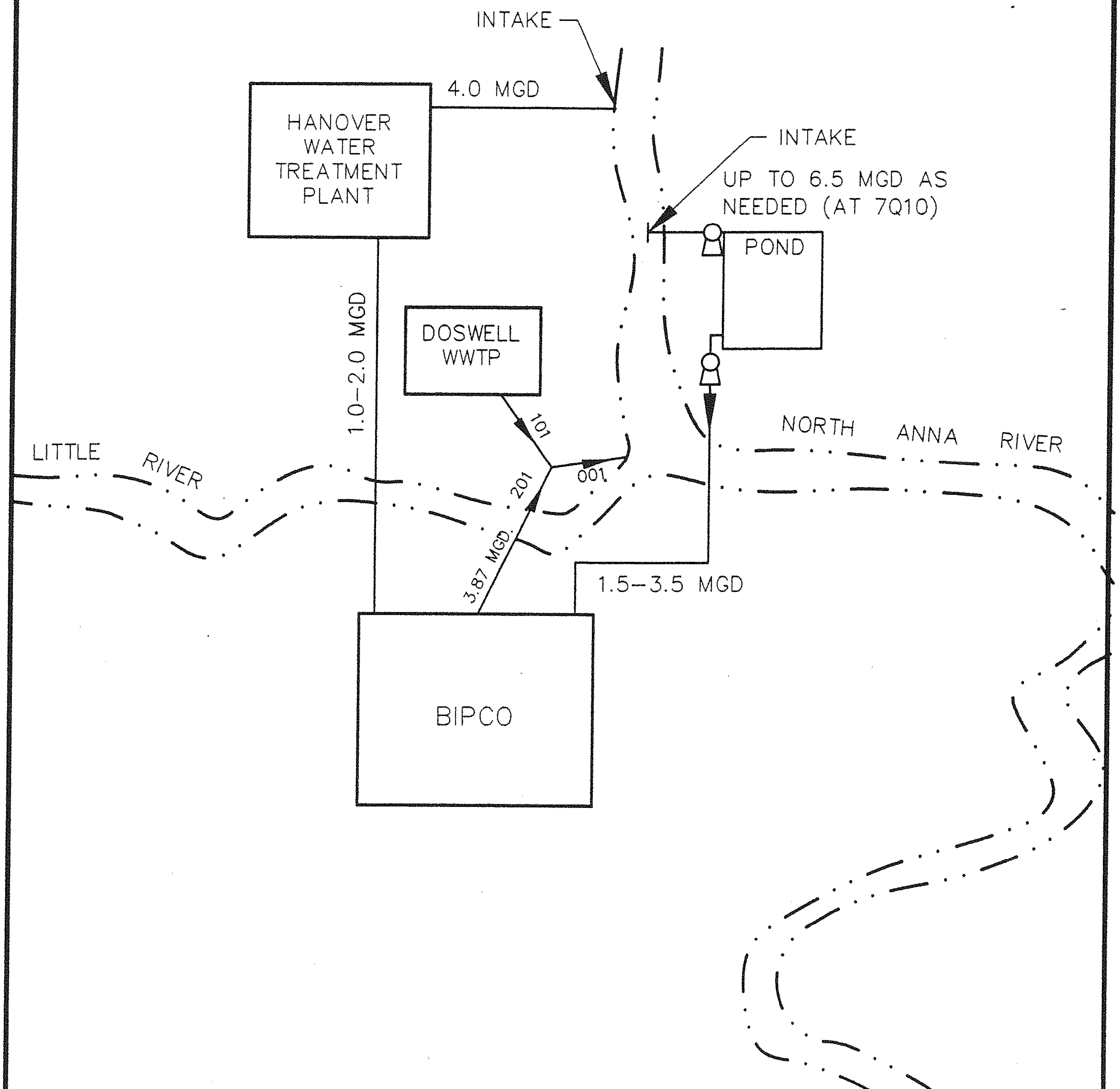


Ashland and Hanover topographic maps
Morris Bridge
Hart Corner
Gravel Pit
Mill
Creek
Bear Island
Little River Crossing
South Anna
RIVER
CHESAPEAKE
AND
OHIO
PAMUNKEY
Wickham Crossing
CAROLINE CO
HANOVER CO
Littlepage Bridge
Sturgeon Hole
Dawn
Cem
Calvary Ch
Hanover
St Pauls Ch
Gravel Pit

Attachment 2

Four schematics are included:

1. Overall water flow schematic
2. Treatment facilities at the Doswell Wastewater Treatment Plant
3. Flow schematic for Bear Island
4. Treatment facilities at the Bear Island Wastewater Treatment Plant



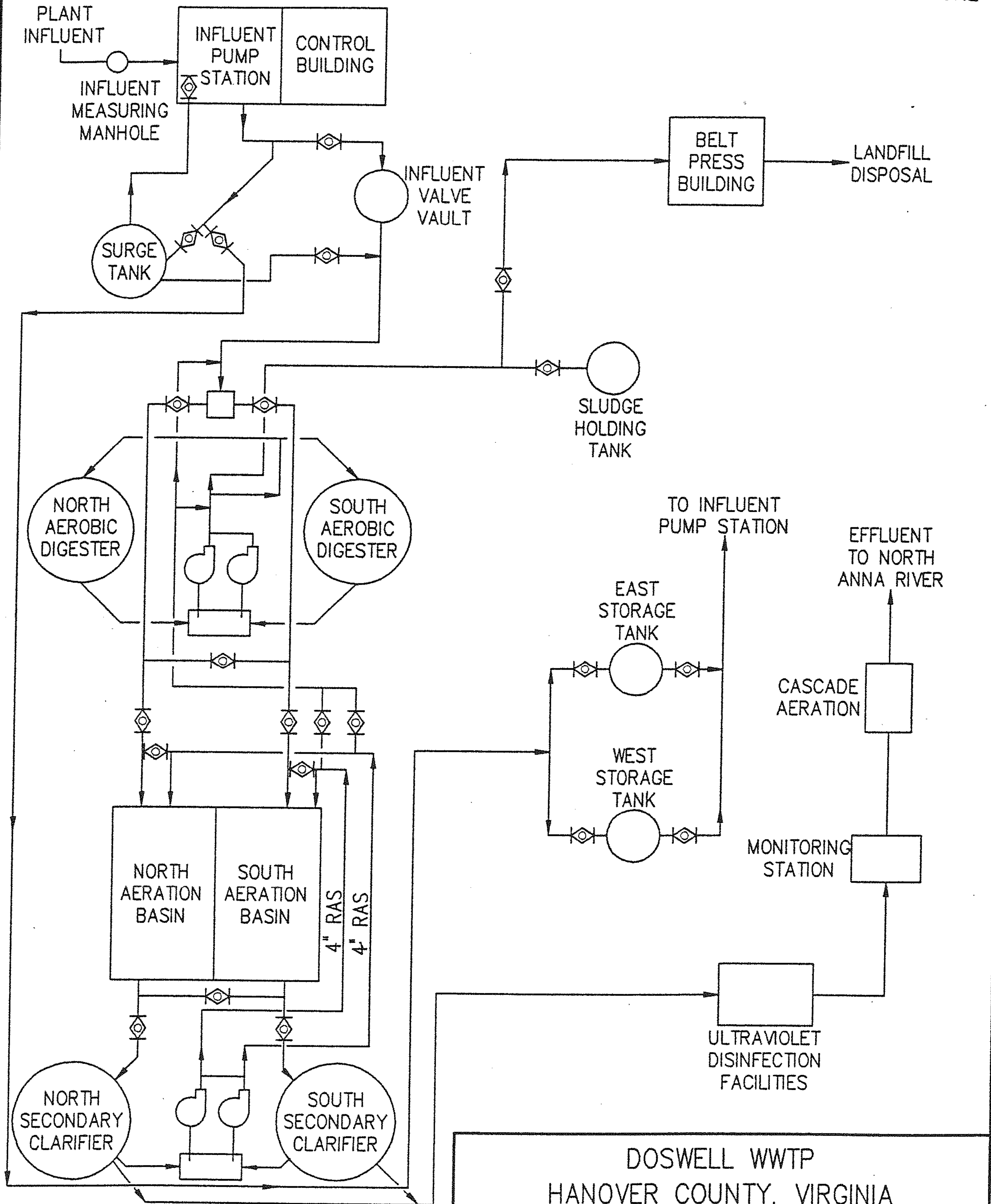
FORM 2c II.A.i
MILL WATER BALANCE

BEAR ISLAND PAPER COMPANY, L.L.C.
WASTEWATER TREATMENT PLANT

SCALE NOT TO SCALE	APPROVED BY :	DRAWN BY: J.K.S.
DATE AUGUST 1999	DESIGNED BY :	REVISED OCT. 1999
PROJECT NUMBER N106–22	AWARE ENVIRONMENTAL INC 9305–J MONROE RD. CHARLOTTE, NC 28270	DRAWING NO. FIGURE

October 15, 1999 2:40:37 p.m.
Drawing: [illegible] N106 1061TPC4.DWG

FIGURE 2

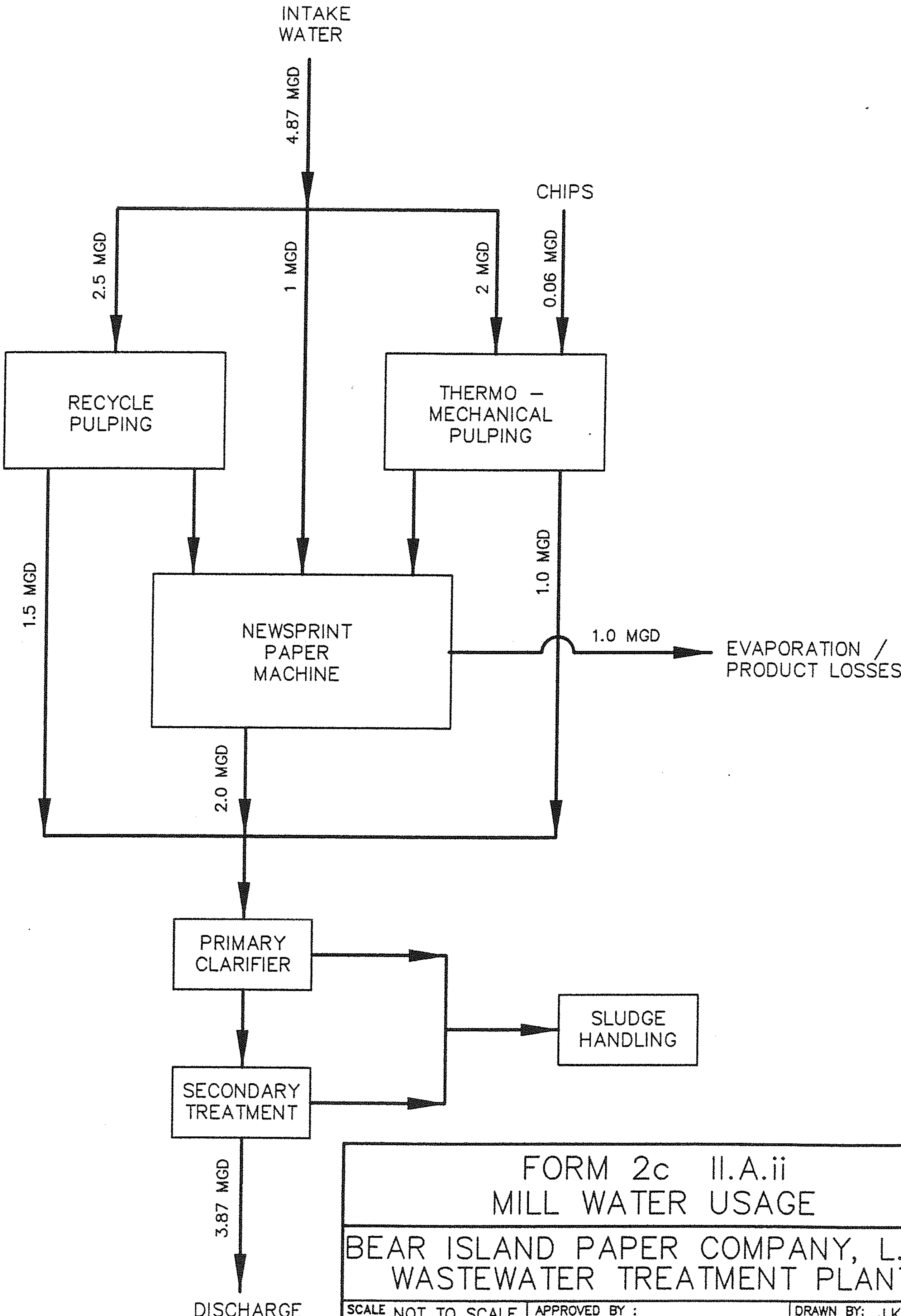


DOSWELL WWTP
HANOVER COUNTY, VIRGINIA

PROCESS FLOW SCHEMATIC

HAZEN AND SAWYER
Environmental Engineers & Scientists

08/04/99 10:53am FILE= H:\2732-034\2732-002 by CRAY XREF FILE = NONE



FORM 2c II.A.ii
MILL WATER USAGE

BEAR ISLAND PAPER COMPANY, L.L.C.
WASTEWATER TREATMENT PLANT

SCALE NOT TO SCALE	APPROVED BY :	DRAWN BY: J.K.S.
DATE AUGUST 1999	DESIGNED BY :	REVISED
PROJECT NUMBER N106-22	AWARE ENVIRONMENTAL INC 9305-J MONROE RD. CHARLOTTE, NC 28270	DRAWING NO. FIGURE

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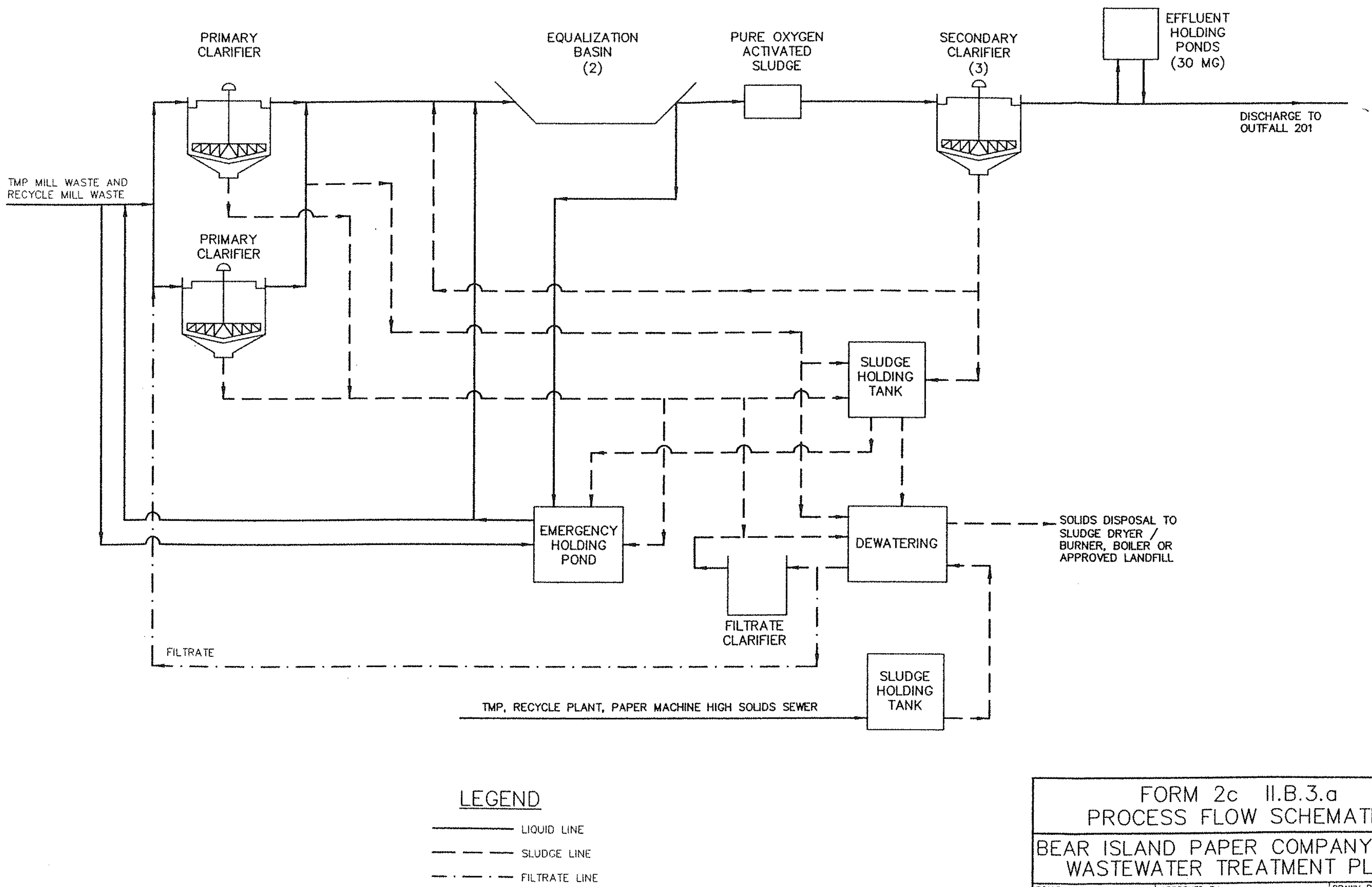


October 18, 1999 10:36:00 a.m.
Drawing: V:\N106\10617P01-1.DWG

FORM 2c II.B.3.a PROCESS FLOW SCHEMATIC		
BEAR ISLAND PAPER COMPANY, L.L.C. WASTEWATER TREATMENT PLANT		
SCALE NOT TO SCALE	APPROVED BY :	DRAWN BY: J.K.S.
DATE AUGUST 1999	DESIGNED BY :	REVISED OCT. 1999
PROJECT NUMBER N106-17	AWARE INC 9305-J MONROE RD. CHARLOTTE, NC 28270	DRAWING NO. FIGURE

Attachment 3

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	1/8/1979	S	.30	6.50	7.30		11.30
8-NAR005.42	3/22/1979	S	.30	12.00	7.00		10.50
8-NAR005.42	4/24/1979	S	.30	15.00	7.50		9.80
8-NAR005.42	6/14/1979	S	.30	21.00	7.00		7.20
8-NAR005.42	8/8/1979	S	.30	28.00	6.80		6.40
8-NAR005.42	9/20/1979	S	.30	18.00	7.00		8.40
8-NAR005.42	10/16/1979	S	.30	13.50	7.00		10.00
8-NAR005.42	11/14/1979	S	.30	9.50	7.00		10.50
8-NAR005.42	12/11/1979	S	.30	6.50	7.00		11.60
8-NAR005.42	1/29/1980	S	.30	4.00	7.10		11.80
8-NAR005.42	2/27/1980	S	.30	5.00	6.80		12.40
8-NAR005.42	3/17/1980	S	.30	8.50	6.70		11.20
8-NAR005.42	4/15/1980	S	.30	14.00	7.40		9.30
8-NAR005.42	5/12/1980	S	.30	18.00	7.50		9.00
8-NAR005.42	6/16/1980	S	.30	25.00	7.10		7.80
8-NAR005.42	7/10/1980	S	.30	27.00	6.80		6.80
8-NAR005.42	8/4/1980	S	.30	29.00	7.20		7.10
8-NAR005.42	9/8/1980	S	.30	25.00	6.90		7.20
8-NAR005.42	10/14/1980	S	.30	14.00	7.30		10.40
8-NAR005.42	11/24/1980	S	.30	5.50	6.90		11.40
8-NAR005.42	12/16/1980	S	.30	4.00	6.50		12.20
8-NAR005.42	1/20/1981	S	.30	.50	6.50		11.60
8-NAR005.42	2/17/1981	S	.30	5.50	7.00		12.00
8-NAR005.42	3/18/1981	S	.30	5.00	6.80		11.50
8-NAR005.42	4/16/1981	S	.30	13.00	7.50		11.00
8-NAR005.42	5/12/1981	S	.30	17.00	7.00		8.40
8-NAR005.42	6/15/1981	S	.30	28.50	7.40		8.10
8-NAR005.42	7/14/1981	S	.30	28.00	7.00		7.00
8-NAR005.42	8/12/1981	S	.30	24.70	7.00		6.40
8-NAR005.42	9/10/1981	S	.30	21.50	7.00		7.90
8-NAR005.42	11/19/1981	S	.30	9.00	7.00		5.00
8-NAR005.42	12/8/1981	S	.30	6.00	6.50		12.20
8-NAR005.42	2/9/1982	S	.30	6.00	6.70		9.40
8-NAR005.42	3/24/1982	S	.30	10.00	6.70		9.20
8-NAR005.42	4/28/1982	S	.30	15.00	6.80		
8-NAR005.42	6/29/1982	S	.30	27.00	6.80		5.90
8-NAR005.42	7/28/1982	S	.30	28.50	7.00		5.80
8-NAR005.42	8/18/1982	S	.30	24.50	6.80		6.20
8-NAR005.42	10/19/1982	S	.30	13.00	6.70		9.80
8-NAR005.42	11/17/1982	S	.30		6.70		11.40
8-NAR005.42	12/16/1982	S	.30	8.00	6.50		10.80
8-NAR005.42	1/27/1983	S	.30	3.50	6.70		12.10
8-NAR005.42	2/10/1983	S	.30	4.00	6.50		12.70
8-NAR005.42	3/15/1983	S	.30	12.00	6.70		10.00
8-NAR005.42	4/19/1983	S	.30	11.00	6.50		11.00
8-NAR005.42	5/19/1983	S	.30	17.00	6.80		9.50
8-NAR005.42	6/21/1983	S	.30	24.50	6.80		7.40
8-NAR005.42	7/12/1983	S	.30	26.00	7.00		7.20
8-NAR005.42	11/15/1983	S	.30	7.00	6.50		11.30
8-NAR005.42	12/8/1983	S	.30	8.00	6.00		12.00
8-NAR005.42	2/7/1984	S	.30	3.00	5.90		13.50

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	3/5/1984	S	.30	8.00	5.50		12.00
8-NAR005.42	4/26/1984	S	.30	9.00	5.90		9.90
8-NAR005.42	6/4/1984	S	.30	21.50	6.60		7.70
8-NAR005.42	7/2/1984	S	.30	25.00	6.92		7.70
8-NAR005.42	8/6/1984	S	.30	25.00	5.90		7.60
8-NAR005.42	9/5/1984	S	.30	21.00	6.69		12.40
8-NAR005.42	10/10/1984	S	.30	18.50	6.10		6.20
8-NAR005.42	1/7/1985	S	.30	8.00	6.06		11.10
8-NAR005.42	2/20/1985	S	.30	4.50	5.70		12.00
8-NAR005.42	3/6/1985	S	.30	6.50			12.20
8-NAR005.42	4/3/1985	S	.30	10.00	6.50		11.40
8-NAR005.42	5/7/1985	S	.30	20.00	6.50		9.90
8-NAR005.42	6/17/1985	S	.30	22.70	6.80		7.80
8-NAR005.42	7/9/1985	S	.30	24.00	6.20		8.10
8-NAR005.42	8/27/1985	S	.30	24.00	6.40		7.60
8-NAR005.42	9/24/1985	S	.30	20.90	6.70		8.60
8-NAR005.42	10/22/1985	S	.30	15.70	5.95		1.00
8-NAR005.42	12/2/1985	S	.30	11.00	6.50		11.10
8-NAR005.42	1/7/1986	S	.30	3.00	6.30		13.00
8-NAR005.42	2/4/1986	S	.30	6.00	6.60		11.80
8-NAR005.42	3/4/1986	S	.30	6.00	6.70		12.30
8-NAR005.42	4/1/1986	S	.30	16.00	6.90		10.40
8-NAR005.42	5/5/1986	S	.30	16.00	7.06		8.90
8-NAR005.42	6/12/1986	S	.30	27.00	7.51		7.50
8-NAR005.42	7/1/1986	S	.30	24.00	7.58		7.80
8-NAR005.42	8/12/1986	S	.30	24.00	7.47		7.40
8-NAR005.42	9/11/1986	S	.30	22.00	7.70		8.90
8-NAR005.42	10/15/1986	S	.30	16.50	7.50		8.00
8-NAR005.42	11/6/1986	S	.30	9.00	7.25		10.10
8-NAR005.42	12/8/1986	S	.30	5.00	7.60		11.80
8-NAR005.42	1/15/1987	S	.30	9.00	7.56		11.10
8-NAR005.42	2/10/1987	S	.30	3.70	7.24		12.40
8-NAR005.42	3/9/1987	S	.30	11.00	7.81		10.50
8-NAR005.42	4/27/1987	S	.30	14.50	7.35		10.00
8-NAR005.42	5/13/1987	S	.30	20.50	7.30		8.20
8-NAR005.42	6/10/1987	S	.30	22.80	7.10		6.00
8-NAR005.42	7/22/1987	S	.30	29.00	6.63		4.20
8-NAR005.42	7/22/1987	S	.30	29.00	6.63		4.20
8-NAR005.42	8/6/1987	S	.30	27.40	7.00		7.30
8-NAR005.42	8/6/1987	S	.30	27.40	7.00		7.30
8-NAR005.42	9/14/1987	S	.30	25.00	7.49		7.60
8-NAR005.42	10/13/1987	S	.30	11.50	7.86		10.00
8-NAR005.42	11/18/1987	S	.30	14.00	8.06		10.50
8-NAR005.42	12/22/1987	S	.30	9.00	8.54		11.20
8-NAR005.42	1/12/1988	S	.30	1.00	8.16		15.20
8-NAR005.42	3/28/1988	S	.30	12.10	7.64		10.20
8-NAR005.42	4/27/1988	S	.30	17.50	7.58		9.60
8-NAR005.42	5/10/1988	S	.30	19.00	7.29		8.70
8-NAR005.42	6/6/1988	S	.30	21.00	8.82		8.30
8-NAR005.42	7/6/1988	S	.30	24.50	7.10		8.20
8-NAR005.42	8/23/1988	S	.30	22.80	7.57		7.60

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	9/19/1988	S	.30	22.00	7.28		8.60
8-NAR005.42	10/6/1988	S	.30	14.00	7.25		9.60
8-NAR005.42	12/8/1988	S	.30				
8-NAR005.42	1/25/1989	S	.30	4.90	6.82		14.30
8-NAR005.42	2/16/1989	S	.30	10.20	7.31		11.50
8-NAR005.42	3/9/1989	S	.30				
8-NAR005.42	4/19/1989	S	.30	15.60	7.86		10.80
8-NAR005.42	5/16/1989	S	.30	14.50	7.30		9.60
8-NAR005.42	6/15/1989	S	.30	25.50	7.00		7.60
8-NAR005.42	7/25/1989	S	.30	28.20	7.00		7.20
8-NAR005.42	8/14/1989	S	.30	23.20	7.32		9.20
8-NAR005.42	9/14/1989	S	.30	24.70	6.74		7.00
8-NAR005.42	10/10/1989	S	.30	11.70	7.65		11.40
8-NAR005.42	11/15/1989	S	.30	17.30	7.33		10.20
8-NAR005.42	12/14/1989	S	.30	4.70	7.40		13.30
8-NAR005.42	1/10/1990	S	.30	6.50	7.05		12.60
8-NAR005.42	2/7/1990	S	.30	10.00	7.30		12.50
8-NAR005.42	3/7/1990	S	.30	8.20	7.90		12.70
8-NAR005.42	4/12/1990	S	.30	12.00	7.86		10.70
8-NAR005.42	5/15/1990	S	.30	18.90	6.46		8.70
8-NAR005.42	6/12/1990	S	.30	21.10	7.73		8.20
8-NAR005.42	7/17/1990	S	.30	25.70	7.34		7.20
8-NAR005.42	8/14/1990	S	.30			7.43	
8-NAR005.42	8/14/1990	B	1.00	25.78	6.97	7.43	
8-NAR005.42	9/17/1990	S	.30	20.10	7.36	7.95	8.00
8-NAR005.42	10/15/1990	S	.30	21.20	6.84	7.50	
8-NAR005.42	10/15/1990	B	1.00				
8-NAR005.42	11/28/1990	S	.30	12.60	7.04	10.16	10.20
8-NAR005.42	12/17/1990	S	.09	9.50	7.34	11.75	11.80
8-NAR005.42	1/15/1991	S	.30				
8-NAR005.42	2/5/1991	S	.30				
8-NAR005.42	3/13/1991	S	.09	7.69	7.39	11.53	11.50
8-NAR005.42	3/13/1991	B	304.50	7.70	7.39		11.50
8-NAR005.42	4/10/1991	S	.09	19.75	7.31	8.91	8.91
8-NAR005.42	4/10/1991	B	.30				
8-NAR005.42	5/8/1991	S	.09	19.30	6.95	8.27	8.30
8-NAR005.42	6/5/1991	S	.30	22.09	7.28		7.79
8-NAR005.42	7/1/1991	S	.30	27.49	6.92	7.06	
8-NAR005.42	8/5/1991	S	.30	25.62	6.40	7.11	
8-NAR005.42	9/4/1991	S	.30	21.50	6.83	8.77	
8-NAR005.42	9/30/1991	S	.30	18.17	7.43	8.87	
8-NAR005.42	9/30/1991	S	.30				
8-NAR005.42	12/3/1991	S	.30	11.57	6.67	9.60	
8-NAR005.42	1/6/1992	S	.30	7.03	6.37	11.79	
8-NAR005.42	2/18/1992	S	.30	6.80	6.45	11.88	
8-NAR005.42	3/4/1992	S	.30	10.50	6.60	11.06	
8-NAR005.42	4/13/1992	S	.30	15.90	6.39	10.05	
8-NAR005.42	5/11/1992	S	.30	16.36	6.01	8.87	
8-NAR005.42	6/10/1992	S	.30	22.86	6.66	7.49	
8-NAR005.42	7/7/1992	S	.30	23.37	6.27	6.78	
8-NAR005.42	8/17/1992	S	.30	21.12	6.02	7.89	

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	9/2/1992	S	.30	22.08	6.70	7.86	
8-NAR005.42	10/1/1992	S	.30	14.90	6.53	9.33	
8-NAR005.42	11/3/1992	S	.30	14.67	6.38	11.14	
8-NAR005.42	12/2/1992	S	.30	8.15	6.74	11.20	
8-NAR005.42	1/5/1993	S	.30	10.86	6.41	10.85	
8-NAR005.42	2/1/1993	S	.30	5.82	6.61	11.89	
8-NAR005.42	3/3/1993	S	.30	7.36	6.51	11.55	
8-NAR005.42	4/5/1993	S	.30	11.05	6.38	10.10	
8-NAR005.42	5/4/1993	S	.30	18.58	6.34	8.71	
8-NAR005.42	6/1/1993	S	.30	20.93	6.26	7.89	
8-NAR005.42	7/12/1993	S	.30	28.01	6.44	6.12	
8-NAR005.42	8/9/1993	S	.30	23.28	6.23	7.32	
8-NAR005.42	9/1/1993	S	.30	25.75	6.54	7.30	
8-NAR005.42	10/7/1993	S	.30	14.82	6.89	9.89	
8-NAR005.42	11/2/1993	S	.30	7.89	6.56	11.07	
8-NAR005.42	12/20/1993	S	.30	6.72	6.78	12.03	
8-NAR005.42	1/31/1994	S	.30	4.18	6.60	12.35	
8-NAR005.42	2/10/1994	S	.30	4.99	6.61	12.35	
8-NAR005.42	3/7/1994	S	.30	8.99	6.49	11.63	
8-NAR005.42	4/11/1994	S	.30	15.17	6.47	9.55	
8-NAR005.42	5/11/1994	S	.30	16.64	6.32	9.16	
8-NAR005.42	6/8/1994	S	.30	25.00	6.51	6.81	
8-NAR005.42	7/11/1994	S	.30	26.32	6.55	6.77	
8-NAR005.42	8/3/1994	S	.30	25.62	6.41	6.64	
8-NAR005.42	9/12/1994	S	.30	19.74	6.81	8.17	
8-NAR005.42	10/11/1994	S	.30	14.01	6.65	9.13	
8-NAR005.42	11/1/1994	S	.30	15.69	6.56	8.31	
8-NAR005.42	12/5/1994	S	.30	9.90	6.75	10.65	
8-NAR005.42	1/4/1995	S	.30	4.63	6.72	12.29	
8-NAR005.42	2/1/1995	S	.30	4.69	6.50	12.68	
8-NAR005.42	3/22/1995	S	.30	13.23	6.59	9.37	
8-NAR005.42	4/25/1995	S	.30	13.76	6.91	10.25	
8-NAR005.42	5/24/1995	S	.30	22.13	6.52	7.94	
8-NAR005.42	6/27/1995	S	.30	25.14	6.42	7.41	
8-NAR005.42	7/26/1995	S	.30	28.95	6.72	6.69	
8-NAR005.42	8/31/1995	S	.30	25.15	6.85	7.34	
8-NAR005.42	9/27/1995	S	.30	16.53	6.82	8.54	
8-NAR005.42	10/12/1995	S	.30	16.62	6.65	8.06	
8-NAR005.42	11/8/1995	S	.30	12.54	6.69	10.01	
8-NAR005.42	12/27/1995	S	.30	3.84	6.65	12.78	
8-NAR005.42	1/31/1996	S	.30	6.54	6.13	11.85	
8-NAR005.42	2/27/1996	S	.30	8.34	6.36	10.69	
8-NAR005.42	3/25/1996	S	.30	9.04	6.26	11.42	
8-NAR005.42	4/18/1996	S	.30	13.96	6.56	10.32	
8-NAR005.42	5/30/1996	S	.30	18.14	6.83	9.17	
8-NAR005.42	6/24/1996	S	.30	27.50	6.71	6.86	
8-NAR005.42	7/29/1996	S	.30	25.09	6.84	7.30	
8-NAR005.42	8/26/1996	S	.30	24.52	6.60	6.90	
8-NAR005.42	9/24/1996	S	.30	19.24	6.54	9.81	
8-NAR005.42	10/29/1996	S	.30	16.58	6.46	7.53	
8-NAR005.42	11/25/1996	S	.30	8.04	6.50	11.33	

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	12/19/1996	S	.30	9.39	6.57	10.90	
8-NAR005.42	1/27/1997	S	.30	6.27	6.77	12.22	
8-NAR005.42	2/13/1997	S	.30	6.07	6.80	12.83	
8-NAR005.42	3/17/1997	S	.30	8.57	6.74	11.01	
8-NAR005.42	4/9/1997	S	.30	13.30	6.63	9.76	
8-NAR005.42	5/5/1997	S	.30	16.03	6.67	9.14	
8-NAR005.42	6/2/1997	S	.30	20.21	6.35	7.94	
8-NAR005.42	7/2/1997	S	.30				
8-NAR005.42	8/4/1997	S	.30	25.85	6.72	7.19	
8-NAR005.42	9/25/1997	S	.30	17.86	6.96	9.00	
8-NAR005.42	10/22/1997	S	.30	12.70	7.10	10.45	
8-NAR005.42	11/10/1997	S	.60				
8-NAR005.42	11/12/1997	S	.30	13.64	6.77	9.46	
8-NAR005.42	12/8/1997	S	.30	5.86	6.65	12.08	
8-NAR005.42	1/12/1998	S	.30	8.65	6.61	11.46	
8-NAR005.42	2/12/1998	S	.30	8.69	6.78	11.11	
8-NAR005.42	3/12/1998	S	.30	8.62	6.30	11.57	
8-NAR005.42	4/13/1998	S	.30	14.38	6.64	10.30	
8-NAR005.42	5/5/1998	S	.30	16.69	6.49	8.81	
8-NAR005.42	6/1/1998	S	.30	25.76	6.75	7.24	
8-NAR005.42	7/6/1998	S	.30	26.01	6.66	7.11	
8-NAR005.42	8/19/1998	S	.30	25.25	6.56	7.41	
8-NAR005.42	9/15/1998	S	.30	23.23	6.71	6.84	
8-NAR005.42	10/6/1998	S	.30	17.31	6.68	8.46	
8-NAR005.42	11/3/1998	S	.30	11.68	6.50	9.57	
8-NAR005.42	12/14/1998	S	.30	6.98	6.35	11.08	
8-NAR005.42	1/12/1999	S	.30	1.88	6.12	13.52	
8-NAR005.42	2/9/1999	S	.30	5.68	6.46	11.97	
8-NAR005.42	3/16/1999	S	.30	9.10	6.17	11.60	
8-NAR005.42	4/19/1999	S	.30	12.70	6.70	9.88	
8-NAR005.42	5/19/1999	S	.30	20.28	6.48	8.08	
8-NAR005.42	6/22/1999	S	.30	20.95	6.83	8.35	
8-NAR005.42	7/1/1999	S	.30	24.89	6.84	6.64	
8-NAR005.42	8/3/1999	S	.30	25.75	6.83	6.76	
8-NAR005.42	9/1/1999	S	.30	20.21	6.93	8.66	
8-NAR005.42	10/18/1999	S	.30	15.88	6.54	9.01	
8-NAR005.42	11/2/1999	S	.30	14.58	6.28	8.75	
8-NAR005.42	12/28/1999	S	.30	3.71	6.71	13.17	
8-NAR005.42	1/5/2000	S	.30	9.81	6.79	10.38	
8-NAR005.42	2/3/2000	S	.30	3.11	6.54	14.70	
8-NAR005.42	3/1/2000	S	.30	10.80	7.07	10.95	
8-NAR005.42	4/12/2000	S	.30	15.66	6.84	8.90	
8-NAR005.42	5/3/2000	S	.30	17.86	6.93	8.93	
8-NAR005.42	6/7/2000	S	.30	19.10	6.56	7.85	
8-NAR005.42	7/6/2000	S	.30	26.18	6.70	6.66	
8-NAR005.42	8/8/2000	S	.30	26.80	6.58	6.17	
8-NAR005.42	9/12/2000	S	.30	22.74	6.75	6.58	
8-NAR005.42	10/16/2000	S	.30	13.89	6.81	9.33	
8-NAR005.42	11/13/2000	S	.30	9.64	6.79	9.77	
8-NAR005.42	12/27/2000	S	.30				
8-NAR005.42	1/16/2001	S	.30	4.13	6.70	12.53	

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	1/31/2001	S	.30	7.65	6.89	11.76	
8-NAR005.42	3/12/2001	S	.30	9.04	6.79	11.15	
8-NAR005.42	4/25/2001	S	.30	18.40	6.84	7.57	
8-NAR005.42	6/11/2001	S	.30	23.25	6.51	7.85	
8-NAR005.42	8/8/2001	S	.30	29.30	7.20	7.92	
8-NAR005.42	10/4/2001	S	.30	18.52	7.00	9.11	
8-NAR005.42	12/27/2001	S	.30	.91	6.11	13.57	
8-NAR005.42	2/5/2002	S	.30	3.36	6.54	12.97	
8-NAR005.42	4/3/2002	S	.30	18.96	6.97	9.51	
8-NAR005.42	6/26/2002	S	.30	28.66	7.80		
8-NAR005.42	7/24/2002	S	.30	26.25	6.65	4.98	
8-NAR005.42	9/19/2002	S	.00				
8-NAR005.42	9/19/2002	S	.30				
8-NAR005.42	11/13/2002	S	.30	13.00	6.37	10.83	
8-NAR005.42	1/2/2003	S	.30	7.84	6.59	11.34	
8-NAR005.42	3/11/2003	S	.30	6.75	7.04	11.90	
8-NAR005.42	5/21/2003	S	.30	18.61	6.60	8.75	
8-NAR005.42	7/10/2003	S	.30	26.91	6.79	6.87	
8-NAR005.42	9/16/2003	S	.30	22.41	6.94	7.65	
8-NAR005.42	11/13/2003	S	.30	15.66	6.94	8.69	
8-NAR005.42	1/21/2004	S	.30	3.69	7.17	12.94	
8-NAR005.42	4/19/2004	S	.30	19.47	6.79	9.18	
8-NAR005.42	5/13/2004	S	.30	23.27	6.86	7.94	
8-NAR005.42	7/13/2004	S	.30	27.15	6.56	6.52	
8-NAR005.42	8/12/2004	S	.30	26.26	6.71	7.31	
8-NAR005.42	9/16/2004	S	.30	24.08	6.90	7.72	
8-NAR005.42	10/5/2004	S	.30	19.65	6.55	9.19	
8-NAR005.42	12/1/2004	S	.30	12.38	7.39	12.42	
8-NAR005.42	12/21/2004	S	.30	3.66	8.64	13.14	
8-NAR005.42	1/19/2005	S	.30	5.13	6.94	13.47	
8-NAR005.42	2/8/2005	S	.30	7.78	6.34	11.65	
8-NAR005.42	3/17/2005	S	.30	8.77	6.38	10.90	
8-NAR005.42	4/21/2005	S	.30	19.30	6.72	8.65	
8-NAR005.42	5/31/2005	S	.30	21.15	7.10	6.42	
8-NAR005.42	6/6/2005	S	.30	24.39	6.39	6.54	
8-NAR005.42	8/3/2005	S	.30	26.97	6.92	6.33	
8-NAR005.42	8/17/2005	S	.30	26.11	6.82	6.54	
8-NAR005.42	9/26/2005	S	.30	22.72	7.04	7.10	
8-NAR005.42	10/13/2005	S	.30	18.02	7.00	8.44	
8-NAR005.42	11/7/2005	S	.30	13.70	6.45	8.72	
8-NAR005.42	12/8/2005	S	.30	5.98	7.20		
8-NAR005.42	1/30/2006	S	.30	8.44	6.59	11.20	
8-NAR005.42	2/28/2006	S	.30	6.67	6.94	12.40	
8-NAR005.42	3/23/2006	S	.30	9.70	7.20	11.50	
8-NAR005.42	4/25/2006	S	.30	18.50	7.40	8.60	
8-NAR005.42	6/28/2006	S	.30	23.10	6.80	7.80	
8-NAR005.42	8/16/2006	S	.30	26.30	7.30	7.50	
8-NAR005.42	8/22/2006	S	.30				
8-NAR005.42	10/16/2006	S	.30	14.80	7.30	9.80	
8-NAR005.42	12/5/2006	S	.30	7.60	6.90	11.40	
8-NAR005.42	1/4/2007	S	.30	9.80	6.80	11.50	

Station ID	Collection Date	Depth Desc	Depth	Temp Celcius	Field Ph	Do Probe	Do Winkler
8-NAR005.42	3/8/2007	S	.30	7.30	6.20	11.20	
8-NAR005.42	3/20/2007	I	.00	10.30	6.40	10.30	
8-NAR005.42	4/11/2007	I	.00	10.40	6.70	10.60	
8-NAR005.42	4/16/2007	I	.00	11.90	6.60	10.20	
8-NAR005.42	5/8/2007	S	.30	15.60	6.80	8.80	
8-NAR005.42	5/16/2007	I	.00	21.30	6.90	7.90	
8-NAR005.42	5/30/2007	I	.00	23.00	6.80	7.20	
8-NAR005.42	6/28/2007	I	.00	28.40	7.00	7.00	
8-NAR005.42	7/9/2007	I	.00	27.10	6.90	7.40	
8-NAR005.42	7/12/2007	S	.30	30.30	5.50	4.80	
8-NAR005.42	8/6/2007	I	.00	26.40	7.10	6.50	
8-NAR005.42	9/5/2007	I	.00	22.50	7.00	7.90	
8-NAR005.42	9/11/2007	S	.30	26.20	7.20	7.40	
8-NAR005.42	10/9/2007	I	.00				
8-NAR005.42	10/9/2007	I	.00	23.40	7.40	10.00	
8-NAR005.42	10/25/2007	I	.00	16.80	6.60	7.70	
8-NAR005.42	10/29/2007	I	.00	12.10	6.80	9.70	
8-NAR005.42	11/5/2007	I	.00	10.90	6.90	10.50	
8-NAR005.42	11/5/2007	I	.00				
8-NAR005.42	11/7/2007	I	.00				
8-NAR005.42	11/26/2007	I	.00	8.00	6.90	10.60	
8-NAR005.42	11/27/2007	S	.30	12.10	6.70	10.60	
8-NAR005.42	1/7/2008	S	.30	7.10	6.30	12.00	
8-NAR005.42	1/10/2008	I	.00	7.20	7.10	11.80	
8-NAR005.42	1/29/2008	I	.00	2.60	7.10	13.20	
8-NAR005.42	1/29/2008	I	.00				
8-NAR005.42	2/3/2008	I	.00	4.20	7.00	11.90	
8-NAR005.42	2/26/2008	I	.00	7.10	7.20	12.60	
8-NAR005.42	3/4/2008	S	.30	12.50	6.50	11.80	
8-NAR005.42	3/6/2008	I	.00	11.20	6.90	11.20	
8-NAR005.42	3/9/2008	I	.00	7.90	6.90	11.20	
8-NAR005.42	3/12/2008	I	.00	8.40	6.80	12.00	
8-NAR005.42	3/27/2008	I	.00	13.60	7.00	10.50	
90th Percentile				**26.2**	**7.4**		
10th Percentile				**5.5**	**6.4**		

Sta Id	Collection Date Time	Depth Desc	Depth	Container I	Comment	00900 HARDNESS, TOTAL (MG/L AS CACO3) Value	Com Code
8-NAR005.42	01/25/1989 13:20	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	02/16/1989 13:10	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	03/09/1989 13:00	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	04/19/1989 13:30	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	05/16/1989 13:00	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	06/15/1989 13:50	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	08/14/1989 14:15	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	09/14/1989 14:00	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	10/10/1989 13:30	S	0.3	R	STORET DATA CONVERSION	24	
8-NAR005.42	11/15/1989 13:15	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	12/14/1989 13:35	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	01/10/1990 12:45	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	02/07/1990 13:20	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	03/07/1990 12:30	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	04/12/1990 13:20	S	0.3	R	STORET DATA CONVERSION	30	
8-NAR005.42	05/15/1990 12:15	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	06/12/1990 12:50	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	07/17/1990 12:55	S	0.3	R	STORET DATA CONVERSION	22	
8-NAR005.42	09/17/1990 12:00	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	10/15/1990 12:10	S	0.3	R	STORET DATA CONVERSION		
8-NAR005.42	11/28/1990 11:30	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	12/17/1990 12:30	S	0.09	R	STORET DATA CONVERSION	22	
8-NAR005.42	01/15/1991 13:15	S	0.3	R	STORET DATA CONVERSION	24	
8-NAR005.42	02/05/1991 10:45	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	03/13/1991 11:46	B	304.5	R	STORET DATA CONVERSION	22	
8-NAR005.42		S	0.09	R	STORET DATA CONVERSION	22	
8-NAR005.42	04/10/1991 13:20	S	0.09	R	STORET DATA CONVERSION	40	
8-NAR005.42	05/08/1991 10:25	S	0.09	R	STORET DATA CONVERSION	46	
8-NAR005.42	06/05/1991 13:20	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	08/05/1991 10:52	S	0.3	R	STORET DATA CONVERSION	34	
8-NAR005.42	09/04/1991 11:40	S	0.3	R	STORET DATA CONVERSION	34	
8-NAR005.42	12/03/1991 11:31	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	01/06/1992 11:20	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	02/18/1992 10:00	S	0.3	R	STORET DATA CONVERSION	24	
8-NAR005.42	03/04/1992 11:10	S	0.3	R	STORET DATA CONVERSION	24	
8-NAR005.42	04/13/1992 12:30	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	05/11/1992 09:20	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	06/10/1992 10:25	S	0.3	R	STORET DATA CONVERSION	32	
8-NAR005.42	07/07/1992 10:49	S	0.3	R	STORET DATA CONVERSION	28	
8-NAR005.42	08/17/1992 10:34	S	0.3	R	STORET DATA CONVERSION	22	
8-NAR005.42	09/02/1992 10:56	S	0.3	R	STORET DATA CONVERSION	2.6	
8-NAR005.42	10/01/1992 11:37	S	0.3	R	STORET DATA CONVERSION	43	
8-NAR005.42	11/03/1992 11:20	S	0.3	R	STORET DATA CONVERSION	34	
8-NAR005.42	12/02/1992 11:00	S	0.3	R	STORET DATA CONVERSION	19	
8-NAR005.42	01/05/1993 11:38	S	0.3	R	STORET DATA CONVERSION	21	
8-NAR005.42	02/01/1993 10:17	S	0.3	R	STORET DATA CONVERSION	28	
8-NAR005.42	03/03/1993 11:33	S	0.3	R	STORET DATA CONVERSION	24	
8-NAR005.42	04/05/1993 10:30	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	05/04/1993 09:30	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	06/01/1993 11:35	S	0.3	R	STORET DATA CONVERSION	21	
8-NAR005.42	07/12/1993 11:00	S	0.3	R	STORET DATA CONVERSION	24	
8-NAR005.42	08/09/1993 10:30	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	09/01/1993 11:10	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	10/07/1993 12:22	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	11/02/1993 10:15	S	0.3	R	STORET DATA CONVERSION	38	
8-NAR005.42	12/20/1993 12:41	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	01/31/1994 11:25	S	0.3	R	STORET DATA CONVERSION	14	
8-NAR005.42	02/10/1994 10:55	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	03/07/1994 12:44	S	0.3	R	STORET DATA CONVERSION	14	
8-NAR005.42	04/11/1994 12:34	S	0.3	R	STORET DATA CONVERSION	15	
8-NAR005.42	05/11/1994 11:00	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	06/08/1994 10:47	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	07/11/1994 11:00	S	0.3	R	STORET DATA CONVERSION	17	

Sta Id	Collection Date Time	Depth Desc	Depth	Container I	Comment	00900 HARDNESS, TOTAL (MG/L AS CACO3) Value	Com Code
8-NAR005.42	08/03/1994 12:11	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	09/12/1994 13:00	S	0.3	R	STORET DATA CONVERSION	26	
8-NAR005.42	10/11/1994 12:00	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	11/01/1994 11:00	S	0.3	R	STORET DATA CONVERSION	19	
8-NAR005.42	12/05/1994 10:00	S	0.3	R	STORET DATA CONVERSION	19	
8-NAR005.42	01/04/1995 12:22	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	02/01/1995 11:21	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	03/22/1995 09:14	S	0.3	R	STORET DATA CONVERSION	14	
8-NAR005.42	04/25/1995 13:20	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	05/24/1995 12:30	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	06/27/1995 08:00	S	0.3	R	STORET DATA CONVERSION	15	
8-NAR005.42	07/26/1995 11:35	S	0.3	R	STORET DATA CONVERSION	22	
8-NAR005.42	08/31/1995 11:40	S	0.3	R	STORET DATA CONVERSION	25	
8-NAR005.42	09/27/1995 11:00	S	0.3	R	STORET DATA CONVERSION	13	
8-NAR005.42	10/12/1995 10:45	S	0.3	R	STORET DATA CONVERSION	23	
8-NAR005.42	11/08/1995 10:00	S	0.3	R	STORET DATA CONVERSION	22	
8-NAR005.42	12/27/1995 10:00	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	01/31/1996 12:05	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	02/27/1996 10:20	S	0.3	R	STORET DATA CONVERSION	14	
8-NAR005.42	03/25/1996 09:45	S	0.3	R	STORET DATA CONVERSION	22	
8-NAR005.42	04/18/1996 12:30	S	0.3	R	STORET DATA CONVERSION	13	
8-NAR005.42	05/30/1996 11:30	S	0.3	R	STORET DATA CONVERSION	30	
8-NAR005.42	06/24/1996 09:00	S	0.3	R	STORET DATA CONVERSION	16	
8-NAR005.42	07/29/1996 10:30	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	08/26/1996 08:45	S	0.3	R	STORET DATA CONVERSION	20	
8-NAR005.42	09/24/1996 07:37	S	0.3	R	STORET DATA CONVERSION	21	
8-NAR005.42	10/29/1996 12:50	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	11/25/1996 10:00	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	12/19/1996 11:11	S	0.3	R	STORET DATA CONVERSION	15	
8-NAR005.42	01/27/1997 13:22	S	0.3	R	STORET DATA CONVERSION	15.6	
8-NAR005.42	02/13/1997 09:54	S	0.3	R	STORET DATA CONVERSION	16.9	
8-NAR005.42	03/17/1997 07:55	S	0.3	R	STORET DATA CONVERSION	18.5	
8-NAR005.42	04/09/1997 11:11	S	0.3	R	STORET DATA CONVERSION	20.7	
8-NAR005.42	05/05/1997 11:44	S	0.3	R	STORET DATA CONVERSION	20.7	
8-NAR005.42	06/02/1997 10:31	S	0.3	R	STORET DATA CONVERSION	22	
8-NAR005.42	07/02/1997 11:55	S	0.3	R	STORET DATA CONVERSION	15.7	
8-NAR005.42	08/04/1997 11:44	S	0.3	R	STORET DATA CONVERSION	19.8	
8-NAR005.42	09/25/1997 15:23	S	0.3	R	STORET DATA CONVERSION	19.1	
8-NAR005.42	10/22/1997 11:30	S	0.3	R	STORET DATA CONVERSION	16.4	
8-NAR005.42	11/12/1997 12:55	S	0.3	R	STORET DATA CONVERSION	13.3	
8-NAR005.42	12/08/1997 12:33	S	0.3	R	STORET DATA CONVERSION	21	
8-NAR005.42	01/12/1998 14:15	S	0.3	R	STORET DATA CONVERSION	48	
8-NAR005.42	02/12/1998 11:01	S	0.3	R	STORET DATA CONVERSION	13.8	
8-NAR005.42	03/12/1998 13:00	S	0.3	R	STORET DATA CONVERSION	18	
8-NAR005.42	04/13/1998 12:40	S	0.3	R	STORET DATA CONVERSION	13.1	
8-NAR005.42	05/05/1998 11:50	S	0.3	R	STORET DATA CONVERSION	14	
8-NAR005.42	06/01/1998 14:22	S	0.3	R	STORET DATA CONVERSION	19.6	
8-NAR005.42	07/06/1998 12:15	S	0.3	R	STORET DATA CONVERSION	13.8	
8-NAR005.42	08/19/1998 11:45	S	0.3	R	STORET DATA CONVERSION	13.7	
8-NAR005.42	09/15/1998 09:30	S	0.3	R	STORET DATA CONVERSION	11.8	
8-NAR005.42	10/06/1998 10:22	S	0.3	R	STORET DATA CONVERSION	10.7	
8-NAR005.42	11/03/1998 11:44	S	0.3	R	STORET DATA CONVERSION	14	
8-NAR005.42	12/14/1998 10:33	S	0.3	R	STORET DATA CONVERSION	19	
8-NAR005.42	01/12/1999 10:33	S	0.3	R		44	
8-NAR005.42	02/09/1999 11:11	S	0.3	R		26	
8-NAR005.42	03/16/1999 12:15	S	0.3	R		36	
8-NAR005.42	04/19/1999 10:55	S	0.3	R		18	
8-NAR005.42	05/19/1999 13:35	S	0.3	R		20	
8-NAR005.42	06/22/1999 14:00	S	0.3	R		13.3	
8-NAR005.42	07/01/1999 11:44	S	0.3	R		12.5	
8-NAR005.42	08/03/1999 10:31	S	0.3	R		14.3	
8-NAR005.42	09/01/1999 12:00	S	0.3	R		9.8	
8-NAR005.42	11/02/1999 12:30	S	0.3	R		18.3	

Sta Id	Collection Date Time	Depth Desc	Depth	Container I	Comment	00900 HARDNESS, TOTAL (MG/L AS CACO3) Value	Com Code
8-NAR005.42	12/28/1999 14:40	S	0.3	R		18.9	
8-NAR005.42	01/05/2000 15:20	S	0.3	R		25.5	
8-NAR005.42	02/03/2000 12:00	S	0.3	R		18.2	
8-NAR005.42	03/01/2000 13:00	S	0.3	R		13	
8-NAR005.42	04/12/2000 11:45	S	0.3	R		13	
8-NAR005.42	05/03/2000 12:30	S	0.3	R		15	
8-NAR005.42	06/07/2000 10:45	S	0.3	R		16	
8-NAR005.42	07/06/2000 10:40	S	0.3	R		16.3	
8-NAR005.42	08/08/2000 10:20	S	0.3	R	NORMAL FLOW	16.6	
8-NAR005.42	09/12/2000 10:30	S	0.3	R		17.5	
8-NAR005.42	10/16/2000 10:30	S	0.3	R	NORMAL FLOW	17.7	
8-NAR005.42	11/13/2000 10:30	S	0.3	R		16	
8-NAR005.42	01/16/2001 12:00	S	0.3	R		14.6	
8-NAR005.42	01/31/2001 13:00	S	0.3	R		17.2	
8-NAR005.42	03/12/2001 12:10	S	0.3	R		14.5	
8-NAR005.42	04/25/2001 12:05	S	0.3	R		5.7	
8-NAR005.42	06/11/2001 12:45	S	0.3	R		7.1	
8-NAR005.42	08/08/2001 16:00	S	0.3	R	LOW FLOW	16.3	
8-NAR005.42	10/04/2001 14:30	S	0.3	R	LOW FLOW	17.5	
8-NAR005.42	12/27/2001 11:00	S	0.3	R	BELOW NORMAL FLOW	7.2	
8-NAR005.42	02/05/2002 13:20	S	0.3	R	LOW FLOW	12.9	
8-NAR005.42	04/03/2002 13:00	S	0.3	R	NORMAL FLOW	18	
8-NAR005.42	06/26/2002 14:15	S	0.3	R	LOW FLOW	15	
8-NAR005.42	07/24/2002 11:40	S	0.3	R		44.5	
8-NAR005.42	11/13/2002 14:10	S	0.3	R		22.8	
8-NAR005.42	01/02/2003 14:10	S	0.3	R	ABOVE NORMAL FLOW	15.5	
8-NAR005.42	03/11/2003 10:45	S	0.3	R	NORMAL FLOW	20.3	
8-NAR005.42	07/10/2003 13:00	S	0.3	R	NORMAL FLOW	21.4	
8-NAR005.42	09/16/2003 13:20	S	0.3	R	NORMAL FLOW	17.7	
8-NAR005.42	11/13/2003 15:25	S	0.3	R	NORMAL FLOW.	16	
8-NAR005.42	01/21/2004 13:10	S	0.3	R	NORMAL FLOW; COMPLETELY FRI	19	
8-NAR005.42	04/19/2004 13:30	S	0.3	R		19.1	
8-NAR005.42	05/13/2004 12:15	S	0.3	R		16	
8-NAR005.42	07/13/2004 10:40	S	0.3	R	NORMAL FLOW.	18.5	
8-NAR005.42	08/12/2004 14:00	S	0.3	R	NORMAL FLOW; PH POST CALIBR/	17.5	
8-NAR005.42	09/16/2004 14:00	S	0.3	R	NORMAL FLOW.	14.7	
8-NAR005.42	10/05/2004 12:50	S	0.3	R		18.2	
8-NAR005.42	12/01/2004 10:40	S	0.3	R	NORMAL FLOW	16	
8-NAR005.42	12/21/2004 13:40	S	0.3	R		16	
8-NAR005.42	01/19/2005 10:40	S	0.3	R	ABOVE NORMAL FLOW.	15	
8-NAR005.42	02/08/2005 12:55	S	0.3	R	NORMAL FLOW	16	
8-NAR005.42	03/17/2005 11:00	S	0.3	R	NORMAL FLOW	16	
8-NAR005.42	04/21/2005 12:45	S	0.3	R		20.8	
8-NAR005.42	05/31/2005 11:20	S	0.3	R	NORMAL FLOW	16	
8-NAR005.42	06/06/2005 12:15	S	0.3	R	NORMAL FLOW	20	
8-NAR005.42	08/03/2005 11:10	S	0.3	R	LOW FLOW	20	
8-NAR005.42	08/17/2005 10:30	S	0.3	R	NORMAL FLOW	18	
8-NAR005.42	09/26/2005 12:20	S	0.3	R	LOW FLOW	18	
8-NAR005.42	10/13/2005 11:40	S	0.3	R	NORMAL FLOW	16	
8-NAR005.42	11/07/2005 11:05	S	0.3	R	NORMAL FLOW	18	
8-NAR005.42	12/08/2005 12:33	S	0.3	R	NORMAL FLOW	20	
8-NAR005.42	01/30/2006 11:00	S	0.3	R	NORMAL FLOW.	15	
8-NAR005.42	02/28/2006 12:54	S	0.3	R	BELOW NORMAL FLOW	15	
8-NAR005.42	03/23/2006 12:03	S	0.3	R	LOW FLOW	18	
8-NAR005.42	04/25/2006 12:10	S	0.3	R	NORMAL FLOW	15	
8-NAR005.42	06/28/2006 10:25	S	0.3	R	FLOOD STAGE	20	
8-NAR005.42	08/16/2006 12:30	S	0.3	R	VERY LOW FLOW	16	
8-NAR005.42	10/16/2006 14:00	S	0.3	R	NORMAL FLOW	18	
8-NAR005.42	12/05/2006 12:10	S	0.3	R	NORMAL FLOW	17	
8-NAR005.42	01/04/2007 14:30	S	0.3	R	ABOVE NORMAL FLOW.	15	
Mean						**19.4**	

Attachment 4

MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL QUALITY
Piedmont Regional Office
4949-A Cox Road Glen Allen, Virginia 23060

SUBJECT: Flow Frequency Determination / 303(d) Status
Doswell WWTF – VA0029521

TO: Ray Jenkins

FROM: Jennifer V. Palmore, P.G. JVP

DATE: April 7, 2008

COPIES: File

The Hanover County Doswell Wastewater Treatment Facility discharges to the North Anna River at the confluence of the Little River downstream of Hart Corner, VA. The rivermile for the discharge is 8-NAR003.55. Flow frequencies have been requested at this site for use in developing effluent limitations for the VPDES permit.

Previous flow frequencies were derived by using the flow frequencies for the gauge at the North Anna River at Hart Corner near Doswell, VA (#01671020), which is located at the Route 30 bridge approximately 2 miles upstream of the discharge, and then subtracting out the flow removed by several water withdrawals located between the gauge and the discharge. At the request of Hanover County, the USGS has installed a gauge on the North Anna directly upstream of the discharge (North Anna River at Little River, VA #01671025); the gauge has been in operation since July 2004. The flow measurements for the two gauges were correlated and were plotted on a logarithmic graph and a best fit power trend line was plotted through the data points.

Due to influence from the Lake Anna dam, only the period of record after 1979 was used to calculate the flow frequencies at the Route 30 gauge. The flow frequencies from the reference gage were plugged into the equation for the regression line to calculate the associated flow frequencies at the discharge point. The flow frequencies for the gauges are presented below. The regression analysis is attached.

North Anna River at Hart Corner near Doswell, VA (#01671020):

Drainage Area = 463 mi^2
Statistical period = 1979-2003
High Flow Months = Jan - May

1Q30 = 35 cfs	High Flow 1Q10 = 49 cfs
1Q10 = 36 cfs	High Flow 7Q10 = 52 cfs
7Q10 = 39 cfs	High Flow 30Q10 = 75 cfs
30Q10 = 42 cfs	HM = 111 cfs
30Q5 = 44 cfs	

North Anna River at Little River (#01671025):

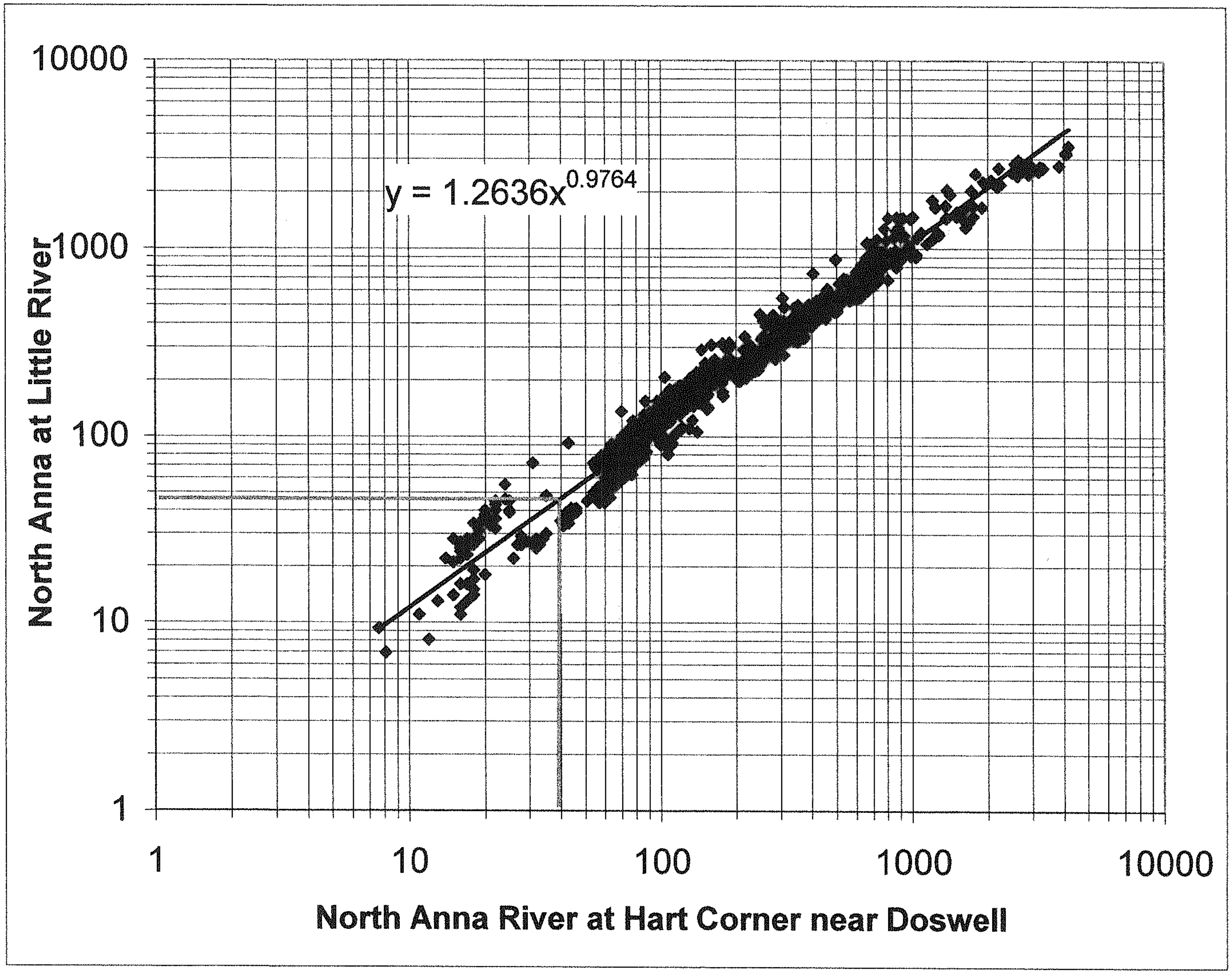
Drainage area = 467 mi^2

1Q30 = 41 cfs (26 MGD)	High Flow 1Q10 = 56 cfs (36 MGD)
1Q10 = 42 cfs (27 MGD)	High Flow 7Q10 = 60 cfs (39 MGD)
7Q10 = 45 cfs (29 MGD)	High Flow 30Q10 = 86 cfs (56 MGD)
30Q10 = 49 cfs (32 MGD)	HM = 126 cfs (81 MGD)
30Q5 = 51 cfs (33 MGD)	

The North Anna River at the discharge point was assessed as a Category 1 water during the 2006 305(b)/303(d) cycle. The river was considered fully supporting of all of its designated uses – Aquatic Life Use, Recreation, Fish Consumption, and Wildlife Use.

If you have any questions concerning this analysis, please let me know.

North Anna at Little River #01671025
vs North Anna River at Hart Corner near Doswell, VA #01671020



SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.975703111
R Square	0.951996561
Adjusted R Square	0.951961213
Standard Error	92.6009299
Observations	1360

Flow Frequencies (cfs)

@ Hart Corner		@ Little River
35	1Q30	41
36	1Q10	42
39	7Q10	45
42	30Q10	49
44	30Q5	51
49	HF 1Q10	56
52	HF 7Q10	60
75	HF 30Q10	86
111	HM	126
463	DA (mi^2)	467

HF Months: Jan-May
Period: 1979-2003

Attachment 5

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

Wastewater Facility Inspection Report

Revised 08/2001

Facility Name: Doswell WWTP

Facility No.: VA0029521

~~City~~/County: Hanover

Inspection Agency: DEQ - PRO

Inspection Date: September 20, 2007

Date Form Completed: September 21, 2007

Inspector: Mike Dare MDare 9-21-08

Time Spent: 8 hrs. w/ travel & report

Reviewed By: CMWood 10/1/07

Unannounced Insp.? No

FY-Scheduled Insp.? Yes

Present at Inspection: Barbara Mitchell, Gary Proffit

TYPE OF FACILITY:

Domestic		Industrial	
[ ] Federal	[X] Major	[ ] Major	[ ] Primary
[x] Non-Federal	[ ] Minor	[ ] Minor	[ ] Secondary

Population Served: approx.: Varies seasonally with the operation of Kings Dominion

Number of Connections: approx.: 8 – the amusement park, Bear Island Paper Co. sanitary sewer & local businesses

TYPE OF INSPECTION:

[x] Routine — Date of last inspection: January 27 & 31, 2005

[ ] Compliance — Agency: DEQ/PRO

[ ] Reinspection

INFLUENT and EFFLUENT MONITORING: **Please refer to the DMR file for Data**

Last month average: **(Influent) Date:**	BOD: ___ mg/L	TSS: ____ mg/L	Flow: __ MGD
Other: _________ mg/L			
Last month: **(Effluent) Date:**	CBOD: ____ mg/L	TSS: ____ mg/L	Flow:___ MGD
Other:			
Quarter average: **(Effluent) Date:**	CBOD: _____ mg/L	TSS: ____ mg/L	Flow: ___ MGD
Other:			

CHANGES AND/OR CONSTRUCTION

DATA VERIFIED IN PREFACE	[ ] Updated	[x] No changes	
Has there been any new construction?	[ ] Yes*	[x] No	
If yes, were plans and specifications approved?	[ ] Yes	[ ] No*	[x] N/A
DEQ approval date:	N/A		

(A) PLANT OPERATION AND MAINTENANCE

1. Class and number of licensed operators: ***Class I – 4; Class II – 1***
2. Hours per day plant is staffed: ***13.5 hours/day, 7 days/week***
3. Describe adequacy of staffing: [ ] Good [ ] Average [x] Poor*
4. Does the plant have an established program for training personnel? [x] Yes [ ] No
5. Describe the adequacy of the training program: [x] Good [ ] Average [ ] Poor*
6. Are preventive maintenance tasks scheduled? [x] Yes [ ] No*
7. Describe the adequacy of maintenance: [ ] Good [x] Average [ ] Poor*
8. Does the plant experience any organic/hydraulic overloading? [ ] Yes* [x] No

   If yes, identify cause and impact on plant: ***Two 0.5 MG Equalization Basins limit impact of surges.***

9. Any bypassing since last inspection? [ ] Yes* [x] No
10. Is the on-site electric generator operational? [x] Yes [ ] No* [ ] N/A
11. Is the STP alarm system operational? [x] Yes [ ] No * [ ] N/A
12. How often is the standby generator exercised? [x] Weekly [ ] Monthly [ ] Other:

    Power Transfer Switch? [x] Weekly [ ] Monthly [ ] Other:

    Alarm System? [x] Weekly [ ] Monthly [ ]Other:
13. When were the cross connection control devices last tested on the potable water service? ***All four tested 10/3/06***
14. Is sludge disposed in accordance with the approved sludge disposal plan? [x] Yes [ ] No* [ ] N/A
15. Is septage received by the facility? [ ] Yes [x] No

    Is septage loading controlled? [ ] Yes [ ] No * [x] N/A

    Are records maintained? [ ] Yes [ ] No* [x] N/A
16. Overall appearance of facility: [ ] Good [x] Average [ ] Poor*

Comments: #1, 2 & 3) In 2000 the plant hours of operation were reduced from 24 hrs/day to 13.5 hrs/day, and the staffing was reduced, however the workload and tasks required to operate the plant did not change. The County Maintenance crew is now being called in to perform routine maintenance tasks. #4 The training program includes unit by unit OJT with the "Doswell WWTP Training Guide", VA Rural Water Assoc. training, Licensing Prep classes at John Tyler and DEQ Lab Workshops. #14 The approved plan calls for landfill disposal.

(B) PLANT RECORDS

1. Which of the following records does the plant maintain?

Operational Logs for each unit process	[x] Yes	[ ] No*	[ ] N/A
Instrument maintenance and calibration	[x] Yes	[ ] No*	[ ] N/A
Mechanical equipment maintenance	[x] Yes	[ ] No*	[ ] N/A
Industrial waste contribution **(Municipal Facilities)**	[ ] Yes	[ ] No*	[x] N/A

2. What does the operational log contain?

Visual Observations	[x] Yes	[ ] No	[ ] N/A
Flow Measurement	[x] Yes	[ ] No	[ ] N/A
Laboratory Results	[x] Yes	[ ] No	[ ] N/A
Process Adjustments	[x] Yes	[ ] No*	[ ] N/A
Control Calculations	[x] Yes	[ ] No	[ ] N/A
Other:			

3. What do the mechanical equipment records contain:

As built plans and specs?	[x] Yes	[ ] No*	[ ] N/A
Spare parts inventory?	[x] Yes	[ ] No*	[ ] N/A
Manufacturers instructions?	[x] Yes	[ ] No*	[ ] N/A
Equipment/parts suppliers?	[x] Yes	[ ] No*	[ ] N/A
Lubrication schedules?	[x] Yes	[ ] No*	[ ] N/A
Other:			
Comments:	None		

4. What do the industrial waste contribution records contain: ***(Applicable to municipal facilities only)***

Waste characteristics?	[ ] Yes	[ ] No*	[x] N/A
Locations and discharge types?	[ ] Yes	[ ] No*	[x] N/A
Impact on plant?	[ ] Yes	[ ] No*	[x] N/A
Other:	N/A		
Comments:	None		

5. Are the following records maintained at the plant:

Equipment maintenance records	[x] Yes	[ ] No*	[ ] N/A
Operational Log	[x] Yes	[ ] No*	[ ] N/A
Industrial contributor records	[ ] Yes	[ ] No*	[x] N/A
Instrumentation records	[x] Yes	[ ] No*	[ ] N/A
Sampling and testing records	[x] Yes	[ ] No*	[ ] N/A

6. Are records maintained at a different location? [ ] Yes [x] No
   Where are the records maintained? ***All are available on site, except some original P&S that are kept at the Courthouse***

7. Were the records reviewed during the inspection? [x] Yes [ ] No

8. Are the records adequate and the O & M Manual current? [x] Yes [ ] No* [ ] N/A
   O&M Manual date written: ***February 1999, upgrade Submitted August 2003***

   Date DEQ approved O&M ***VDH approval 8/18/99;***

9. Are the records maintained for required 3-year period? [x] Yes [ ] No*

Comments: #1. - A single operational log is kept for the entire plant. Log includes notes for various treatment units, observations, equipment adjustments and control tests. #2. - Lab records are separate from operational log.

(C) SAMPLING

1. Are sampling locations capable of providing representative samples? [x] Yes [ ] No* [ ] N/A
2. Do sample types correspond to those required by the permit? [x] Yes [ ] No* [ ] N/A
3. Do sampling frequencies correspond to those required by the permit? [x] Yes [ ] No* [ ] N/A
4. Are composite samples collected in proportion to flow? [x] Yes [ ] No* [ ] N/A
5. Are composite samples refrigerated during collection? [x] Yes [ ] No* [ ] N/A
6. Does plant maintain required records of sampling? [x] Yes [ ] No* [ ] N/A
7. Does plant run operational control tests? [x] Yes [ ] No* [ ] N/A

Comments: Please see attached operational control data.

(D) TESTING

1. Who performs the testing?
   [x] Plant/ Lab: ***BOD, TSS, pH, D.O.***
   [ ] Central Lab
   [x] Commercial Lab - Name: ***EnviroCompliance – Nutrients, Microbac – Fecals, Totopotomy WWTP Lab – Ortho/Total P***

If plant performs any testing, complete 2-4.

2. What method is used for chlorine analysis? ***N/A – UV disinfection***
3. Is sufficient equipment available to perform required tests? [x] Yes [ ] No* [ ] N/A
4. Does testing equipment appear to be clean and/or operable? [x] Yes [ ] No* [ ] N/A

Comments: Please see enclosed DEQ *Laboratory Inspection Report.*

(E) FOR INDUSTRIAL FACILITIES W/ TECHNOLOGY BASED LIMITS N/A

1. Is the production process as described in the permit application? (If no, describe changes in comments)
   [ ] Yes [ ] No* [x] N/A
2. Do products and production rates correspond to the permit application? (If no, list differences in comments section)
   [ ] Yes [ ] No* [x] N/A
3. Has the State been notified of the changes and their impact on plant effluent?
   [ ] Yes [ ] No* [x] N/A

Comments: None

FOLLOW UP TO COMPLIANCE RECOMMENDATIONS FROM THE January 27 & 31, 2005 DEQ INSPECTION:

1. There were no Compliance Recommendations.

FOLLOW UP TO GENERAL RECOMMENDATIONS FROM THE January 27 & 31, 2005 DEQ INSPECTION:

1. The intensity sensor on the UV light system is malfunctioning; always indicating low intensity, even with new bulbs. The manufacturer has not been able to resolve the problem. Currently bulb cleaning is scheduled for every other week. Based on fecal coliform monitoring, this frequency of cleaning is adequate to maintain sufficient intensity for disinfection. Discussing this matter with your DEQ Permit Writer, Ray Jenkins, is recommended. ***One bank of bulbs is cleaned each week, or sooner if fecal results spike. This procedure reportedly approved by Mr. Jenkins.***

2. Repair the aerator from the East EQ basin as soon as practical. The East basin was offline and currently not needed; generally only one of the 0.5 MG basins is required. ***Aerator has been repaired.***

3. Pump station debris is being applied to drying beds. In addition to raw sewage, which carries pathogens and attracts rodents, the solids removed from the pumping stations often contain a lot of grease which may clog the drainage system. The County staff should look at other options for providing a suitable receiving station for the vac-trucks. ***Most pump station debris now going to Totopotomy WWTP for dewatering and disposal.***

INSPECTION REPORT SUMMARY

Compliance Recommendations/Request for Corrective Action:

1. There are no compliance recommendations.

General Recommendations and Observations:

There are no General Recommendations.

Items evaluated during this inspection include (check all that apply):

[x] Yes	[ ] No		Operational Units
[ ] Yes	[x] No		O & M Manual
[x] Yes	[ ] No		Maintenance Records
[ ] Yes	[ ] No	[x] N/A	Pathogen Reduction & Vector Attraction Reduction
[ ] Yes	[x] No	[ ] N/A	Sludge Disposal Plan
[ ] Yes	[ ] No	[x] N/A	Groundwater Monitoring Plan
[ ] Yes	[ ] No	[x] N/A	Storm Water Pollution Prevention Plan
[x] Yes	[ ] No	[ ] N/A	Permit Special Conditions
[x] Yes	[ ] No	[ ] N/A	Permit Water Quality Chemical Monitoring
[x] Yes	[ ] No	[ ] N/A	Laboratory Records (see Lab Report)

DEPARTMENT OF ENVIRONMENTAL QUALITY - WATER DIVISION
LABORATORY INSPECTION REPORT

10/01

FACILITY NO:	INSPECTION DATE:	PREVIOUS INSP. DATE:	PREVIOUS EVALUATION:	TIME SPENT:
VA0029521	September 20, 2007	January 27, 2005	Deficiencies	8 hours w/ travel & report

NAME/ADDRESS OF FACILITY:	FACILITY CLASS:	FACILITY TYPE:	UNANNOUNCED INSPECTION?
Doswell Wastewater Treatment Plant P.O. Box 470 Hanover, VA 23069	(X) MAJOR ( ) MINOR ( ) SMALL ( ) VPA/NDC	(X) MUNICIPAL ( ) INDUSTRIAL ( ) FEDERAL ( ) COMMERCIAL LAB	( ) YES (x) NO **FY-SCHEDULED INSPECTION?** (X) YES ( ) NO

INSPECTOR(S):	REVIEWERS:	PRESENT AT INSPECTION:
Mike Dare M Dare 9-21-07	CM Wood 10/1/07	Barbara Mitchell

LABORATORY EVALUATION	DEFICIENCIES? Yes	No
LABORATORY RECORDS		x
GENERAL SAMPLING & ANALYSIS		x
LABORATORY EQUIPMENT		x
DISSOLVED OXYGEN ANALYSIS PROCEDURES		x
pH ANALYSIS PROCEDURES		x
BIOCHEMICAL OXYGEN DEMAND ANALYSIS PROCEDURES	x	
TOTAL SUSPENDED SOLIDS ANALYSIS PROCEDURES		x

QUALITY ASSURANCE/QUALITY CONTROL

Y/N	QUALITY ASSURANCE METHOD	PARAMETERS	FREQUENCY
Y	REPLICATE SAMPLES	BOD samples, Blanks, Seed Dilutions and TSS samples	Each weekly
	SPIKED SAMPLES		
Y	STANDARD SAMPLES	BOD - GGA	Weekly
	SPLIT SAMPLES		
Y	SAMPLE BLANKS	BOD	each series
	OTHER		
Y	EPA-DMR QA DATA?	RATING: (X) No Deficiency ( ) Deficiency ( ) NA *Study 26*	
	QC SAMPLES PROVIDED?	RATING: ( ) No Deficiency ( ) Deficiency (X) NA	

COPIES TO: (X) DEQ - RO; (X) OWPP; ( ) VDH- DWE; (X) OWNER; (X) EPA-Region III; ( ) Other:

FACILITY #: VA0029521

LABORATORY RECORDS SECTION					
LABORATORY RECORDS INCLUDE THE FOLLOWING:					
X	SAMPLING DATE	X	ANALYSIS DATE	X	CONT MONITORING CHART
X	SAMPLING TIME	X	ANALYSIS TIME	X	INSTRUMENT CALIBRATION
X	SAMPLE LOCATION	X	TEST METHOD	X	INSTRUMENT MAINTENANCE
				X	CERTIFICATE OF ANALYSIS
WRITTEN INSTRUCTIONS INCLUDE THE FOLLOWING:					
X	SAMPLING SCHEDULES	X	CALCULATIONS	X	ANALYSIS PROCEDURES

	YES	NO	N/A
DO ALL ANALYSTS INITIAL THEIR WORK?	X		
DO BENCH SHEETS INCLUDE ALL INFORMATION NECESSARY TO DETERMINE RESULTS?	X		
IS THE DMR COMPLETE AND CORRECT? MONTH(S) REVIEWED: ***August 2007***	X		
ARE ALL MONITORING VALUES REQUIRED BY THE PERMIT REPORTED?	X		

GENERAL SAMPLING AND ANALYSIS SECTION

	YES	NO	N/A
ARE SAMPLE LOCATION(S) ACCORDING TO PERMIT REQUIREMENTS?	X		
ARE SAMPLE COLLECTION PROCEDURES APPROPRIATE?	X		
IS SAMPLE EQUIPMENT CONDITION ADEQUATE?	X		
IS FLOW MEASUREMENT ACCORDING TO PERMIT REQUIREMENTS?	X		
ARE COMPOSITE SAMPLES REPRESENTATIVE OF FLOW?	X		
ARE SAMPLE HOLDING TIMES AND PRESERVATION ADEQUATE?	X		
IF ANALYSIS IS PERFORMED AT ANOTHER LOCATION, ARE SHIPPING PROCEDURES ADEQUATE? LIST PARAMETERS AND NAME & ADDRESS OF LAB: ***Ammonia, TKN, Nitrate, Nitrite - EnviroCompliance Laboratories, Inc, Glen Allen, VA; Fecals – Microbac, Richmond, VA; Ortho/Total P – Totopotomy WWTP Lab.***	X		

LABORATORY EQUIPMENT SECTION

	YES	NO	N/A
IS LABORATORY EQUIPMENT IN PROPER OPERATING RANGE?	X		
ARE ANNUAL THERMOMETER CALIBRATION(S) ADEQUATE?	X		
IS THE LABORATORY GRADE WATER SUPPLY ADEQUATE?			X
ARE ANALYTICAL BALANCE(S) ADEQUATE?	X		

LABORATORY INSPECTION REPORT SUMMARY

FACILITY NAME:	FACILITY NO:	INSPECTION DATE:
Doswell WWTP	VA0029521	September 20, 2007

LABORATORY EVALUATION:	(X) Deficiencies ( ) No Deficiencies

LABORATORY RECORDS

No Deficiencies – As allowed by the permit, Ms. Mitchell will begin including DMR data for any incomplete calendar week at months end in the following monthly reporting period.

GENERAL SAMPLING AND ANALYSIS

No Deficiencies

LABORATORY EQUIPMENT

No Deficiencies

INDIVIDUAL PARAMETERS

pH, Dissolved Oxygen, and Total Suspended Solids Analysis Procedures: No deficiencies

Biochemical Oxygen Demand Analysis Procedures:

1. Two of five seed corrections for period 7/29/07 to 8/2/07 are >1.0 mg/L. Data not flagged. Flag on bench sheet and DMR.

Attachment 6

Subsections this Attachment are identified as 6A, 6B, and 6C

Attachment 6A presents the results of water quality criteria monitoring on Outfall 001

Attachment 6B presents Discharge Monitoring Report (DMR) data for Outfall 001

Attachment 6C presents DMR data for Outfalls 101 and 102

Attachment 6A

Results of water quality criteria monitoring on Outfall 001

Attachment 6A

Items in bold face are considered to be present in the discharge and require evaluation. See Attachment 7 of this fact sheet. Dioxin was not tested at the required QL and is also addressed in Attachment 7.

Parameter	Required QL (µg/L)	February 28, 2007	May 23, 2007	July 25, 2007
METALS (µg/L)				
Antimony, dissolved	18000	<100	<100	<100
Arsenic, dissolved	210	<60	<60	<60
Cadmium, dissolved	3.1	<0.50	<0.50	<0.50
Chromium, dissolved	---	<10	<10	<10
Chromium III, dissolved	570			<10
Chromium VI, dissolved	9.2			<5.0
Copper, dissolved	30	**6**	**<5**	**<5**
Lead, dissolved (A)	44	**<20**	**<20**	**30**
Mercury, dissolved	1.0	<0.1	<0.1	<0.1
Nickel, dissolved	57	<10	<10	<10
Selenium, dissolved	10.0	<2	<2	<2
Silver, dissolved	11.0	<5	<5	<5
Thalium, dissolved	(B)	<40	<40	<40
Zinc, dissolved (A)	180	**108**	**101**	**134**
PESTICIDES / PCBs (µg/L)				
Aldrin	0.05			<0.05
Chlordane	0.2			<0.20
Chlorpyrifos	(B)			<0.10
DDD	0.1			<0.05
DDE	0.1			<0.05
DDT	0.1			<0.05
Demeton	(B)			<0.10
Dieldrin	0.1			<0.05
Alpha-Endosulfan	0.1			<0.05
Beta -Endosulfan	0.1			<0.05
Endosulfan sulfate	0.1			<0.05
Endrin	0.1			<0.05
Endrin Aldehyde	(B)			<0.05
Guthion	(B)			<0.10
Heptachlor	0.05			<0.05
Heptachlor Epoxide	(B)			<0.05
Alpha-BHC	(B)			<0.05
Beta-BHC	(B)			<0.05
Gamma-BHC or Lindane	0.05			<0.05
Kepone	(B)			<0.40
Malathion	(B)			<0.10
Methoxychlor	(B)			<0.05
Mirex	(B)			<0.05
Parathion	(B)			<0.10
PCB 1260	1.0			<1
PCB 1254	1.0			<1
PBC 1248	1.0			<1
PCB 1242	1.0			<1
PCB 1232	1.0			<1
PCB 1221	1.0			<1
PCB 1016	1.0			<1
PCB Total	7.0			<7
Toxaphene	5.0			<5.0
BASE NEUTRALS (µg/L)				
Acenapthene	10.0	<10.0	<10.0	<10.0
Anthracene	10.0	<10.0	<10.0	<10.0
Benzidine	(B)	<10.0	<10.0	<10.0
Benzo (a) anthracene	10.0	<10.0	<10.0	<10.0
Benzo (b) fluoranthene	10.0	<10.0	<10.0	<10.0
Benzo (k) fluoranthene	10.0	<10.0	<10.0	<10.0
Benzo (a) pyrene	10.0	<10.0	<10.0	<10.0
Bis 2-Chloroethyl Ether	(B)	<10.0	<10.0	<10.0
Bis 2-Chloroisopropyl Ether	(B)	<10.0	<10.0	<10.0
Butyl benzyl phthalate	10.0	<10.0	<10.0	<10.0
2-Chloronapthalene	(B)	<10.0	<10.0	<10.0
Chrysene	10.0	<10.0	<10.0	<10.0

	Required QL (µg/L)	February 28, 2007	May 23, 2007	July 25, 2007
Parameter				
Dibenz(a,h)anthracene	20.0	<10.0	<10.0	<10.0
Dibutyl phthalate	10.0	<10.0	<10.0	<10.0
1,2- Dichlorobenzene	10.0	<10.0		
1,3- Dichlorobenzene	10.0	<10.0		
1,4- Dichlorobenzene	10.0	<10.0		
3,3-Dichlorobenzidine	(B)	<10.0	<10.0	<10.0
Diethyl phthalate	10.0	<10.0	<10.0	<10.0
Di-2-Ethylhexyl Phthalate	10.0	<10.0	<10.0	<10.0
Dimethyl phthalate	(B)	<10.0	<10.0	<10.0
2,4-Dinitrotoluene	10.0	<10.0	<10.0	<10.0
1,2-Diphenylhydrazine	(B)	<10.0	<10.0	<10.0
Fluoranthene	10.0	<10.0	<10.0	<10.0
Fluorene	10.0	<10.0	<10.0	<10.0
Hexachlorobenzene	(B)	<10.0	<10.0	<10.0
Hexachlorobutadiene	(B)	<10.0	<10.0	<10.0
Hexachlorocyclopentadiene	(B)	<10.0	<10.0	<10.0
Hexachloroethane	(B)	<10.0	<10.0	<10.0
Indeno (1,2,3-cd) pyrene	20.0	<10.0	<10.0	<10.0
Isophorone	10.0	<10.0	<10.0	<10.0
Nitrobenzene	10.0	<10.0	<10.0	<10.0
N-Nitrosodimethylamine	(B)	<10.0	<10.0	<10.0
N-Nitrosodi-n-propylamine	(B)	<10.0	<10.0	<10.0
N-Nitrosodiphenylamine	(B)	<10.0	<10.0	<10.0
Pyrene	10.0	<10.0	<10.0	<10.0
1,2,4-Trichlorobenzene	10.0	<10.0	<10.0	<10.0
VOLATILES (µg/L)				
Acrolein	(B)	<10.0	<10.0	<10.0
Acrylonitrile	(B)	<10.0	<10.0	<10.0
Benzene	10.0	<10.0	<10.0	<10.0
Bromoform	10.0	<10.0	<10.0	<10.0
Carbon Tetrachloride	10.0	<10.0	<10.0	<10.0
Chlorobenzene	(B)	<10.0	<10.0	<10.0
Chlorodibromomethane	10.0	<10.0	<10.0	<10.0
Chloroform	10.0	<10.0	<10.0	<10.0
Dichloromethane	20.0	<10.0	<10.0	<10.0
Dichlorobromomethane	20.0	<10.0	<10.0	<10.0
1,2-Dichloroethane	10.0	<10.0	<10.0	<10.0
1,1-Dichloroethylene	10.0	<10.0	<10.0	<10.0
1,2-trans-dichloroethylene	(B)	<10.0	<10.0	<10.0
1,2-Dichloropropane	(B)	<10.0	<10.0	<10.0
1,3-Dichloropropene	(B)	<20.0	<20.0	<20.0
Ethylbenzene	10.0	<10.0	<10.0	<10.0
Methyl bromide	(B)	<10.0	<10.0	<10.0
1,1,2,2-Tetrachloroethane	(B)	<10.0	<10.0	<10.0
Tetrachloroethylene	10.0	<10.0	<10.0	<10.0
Toluene	10.0	<10.0	<10.0	<10.0
1,1,2-Trichloroethane	(B)	<10.0	<10.0	<10.0
Trichloroethylene	10.0	<10.0	<10.0	<10.0
Vinyl chloride	10.0	<10.0	<10.0	<10.0
RADIONUCLIDES				
Strontium 90 (pCi/L)	(B)	Sampling for radionuclides will be required by special condition in the permit to be reissued.		
Tritium (pCi/L)	(B)			
Beta Particle & Photon Activity (mrem/yr)	(B)			
Gross Alpha Particle Activity (pCI/L)	(B)			
ACIDS (µg/L)				
2-Chlorophenol	10.0	<10.0	<10.0	<10.0
2,4 Dichlorophenol	10.0	<10.0	<10.0	<10.0
2,4- Dimethylphenol	10.0	<10.0	<10.0	<10.0
2,4-Dinitrophenol	(B)	<20.0	<20.0	<10.0
2-Methyl-4,6-Dinitrophenol	(B)	<10.0	<20.0	<10.0
Pentachlorophenol	50.0	<10.0	<20.0	<10.0
Phenol	10.0	<10.0	<10.0	<10.0
2,4,6-Trichlorophenol	10.0	<10.0	<10.0	<10.0
MISCELLANEOUS (µg/L unless otherwise noted)				
Chlorides, mg/L	(B)			29

Parameter	Required QL (µg/L)	February 28, 2007	May 23, 2007	July 25, 2007
Total Residual Chlorine	100	See footnote (C) below		
Cyanide, Total [(D)]	10.0	**11**	**10**	**<10**
Dioxin	0.00001			<0.0000101
Hardness, mg/L	(B)	586	581	521
Hydrogen sulfide	(B)			<300 sulfide
Tributyltin	(B)			<0.030
Xylenes total	6.0			<6.00

(A) Additional Data:	Dissolved Lead	Dissolved Zinc
October 11, 2007	<20	218
October 12, 2007	<20	173
October 17, 2007	<20	98
October 18, 2007	<20	113
October 24, 2007	<20	110
October 25, 2007	<20	104
October 31, 2007	<20	109
December 19, 2007	---	204

(B) Any approved method in 40 CFR Part 136 if the parameter is addressed in 40 CFR Part 136.

(C) In March 2007, TRC concentrations of 0.19 mg/L, 0.41 mg/L, and 0.48 mg/L were determined in conjunction with WET testing on Outfall 001. These data are not considered representative of Outfall 001 as neither the Doswell treatment plant nor Bear Island use chlorine compounds. These results are thought to be due to test interferences.

(D) Additional Data from cyanide study. These data were used to modify the permit in October 2006 to remove cyanide limitations that were added to the permit at reissuance in May 2003.

March 1, 2004	7.64
March 8, 2004	10.1
March 15, 2004	10.1
March 22, 2004	15.3
March 31, 2004	9.52
April 5, 2004	13.2
April 12, 2004	14.8
April 19, 2004	8.20
April 26, 2004	8.20
May 3, 2004	11.1
May 10, 2004	10.4
May 17, 2004	8.2
May 24, 2004	16.9
January 3, 2005	<6
April 4, 2005	18.8
July 11, 2005	9.77
October 10, 2005	11.2

Attachment 6B

Discharge Monitoring Report (DMR) data for Outfall 001

Attachment 6B

Outfall 001 Effluent Data

Outfall 001 Effluent Data from Discharge Monitoring Reports

Sample frequency is once per day unless otherwise noted.

Date	BOD_5, mg/L		TSS, mg/L (3/W)		D.O., mg/L	TKN, mg/L (3/W)	Temperature, ºF			pH, Standard Units		Ammonia, mg/L (1/M)
	Reported	Limitation	Reported	Limitation	Minimum	Weekly Average	Minimum	Average	Maximum	Minimum	Maximum	Monthly Average
	Monthly Averages											
2005												
July	8.3	40.9	17.6	47.0	6.7	7.50	80.6	86.3	93.2	7.3	7.8	3.30
August	15.8	43.7	23.3	46.5	6.5	10.48	82.4	87.3	91.4	7.4	7.8	0.40
September	6.7	43.5	17.0	47.8	6.6	4.92	73.4	84.6	89.6	7.5	7.9	0.60
October	5.0	48.2	14.5	48.2	7.4	4.24	68.0	77.9	87.8	7.3	7.7	0.30
November	6.0	49.2	16.8	49.2	7.8	4.79	64.4	72.0	80.6	7.2	7.8	0.60
December	10.5	49.5	19.1	49.4	8.1	2.74	60.8	66.8	78.8	7.1	7.6	<0.20
2006												
January	5.5	49.1	15.0	49.1	7.7	3.62	59.0	67.6	80.6	7.0	7.7	1.36
February	9.2	49.2	15.1	49.2	8.2	2.98	60.8	70.2	77.0	7.1	7.6	<0.20
March	7.0	49.3	15.4	49.4	7.4	5.72	66.2	71.6	80.6	7.2	7.9	<0.20
April	7.9	48.9	15.6	48.9	6.8	7.90	60.8	75.0	84.2	7.1	7.8	1.10
May	4.2	48.9	6.2	48.9	6.9	3.14	64.4	80.7	87.8	7.2	7.8	0.29
June	10.1	48.6	15.4	48.6	6.5	4.53	78.8	87.1	95.0	7.1	7.8	<0.20
July	11.8	47.7	13.4	47.8	6.5	4.05	84.6	89.8	93.2	7.1	7.7	0.20
August	12.4	47.8	16.8	47.8	6.5	4.34	84.2	91.9	96.8	7.3	7.6	0.50
September	10.6	48.5	16.9	48.6	6.6	3.74	75.2	84.8	95.0	7.0	7.9	<0.20
October	7.2	48.9	13.4	49.0	6.5	4.52	68.0	77.3	84.2	7.3	7.9	2.00
November	8.9	48.9	20.9	48.9	6.5	4.42	60.8	70.9	80.6	7.1	7.9	1.50
December	8.7	49.5	17.3	49.5	6.6	3.14	66.2	74.5	82.4	7.2	7.8	0.40
2007												
January	3.8	49.3	12.1	49.4	6.5	2.39	55.4	68.8	80.6	7.0	7.7	0.30
February	10.5	49.5	26.0	49.5	7.9	2.29	53.6	69.0	75.2	7.3	7.8	<0.20
March	7.1	49.2	18.2	49.3	7.7	3.76	57.2	70.3	82.4	7.3	7.9	<0.20
April	2.2	49.0	8.7	49.0	7.0	3.30	60.8	76.2	84.2	7.2	7.9	<0.20
May	5.9	49.0	8.0	49.1	6.9	2.59	78.8	83.8	91.4	7.4	7.8	0.40
June	12.4	48.3	15.5	48.5	6.9	3.55	80.6	86.2	91.4	7.1	7.8	0.20
July	4.4	47.7	15.3	47.7	7.1	2.56	78.8	85.7	89.6	7.3	7.8	0.40
August	3.8	47.8	12.9	47.9	6.7	4.21	80.6	86.9	89.6	7.6	7.9	<0.20
September	9.3	48.8	13.6	48.8	6.9	3.61	80.6	85.6	89.6	7.4	7.7	<0.20
October	3.3	48.5	10.3	48.6	6.8	5.37	71.6	78.2	84.2	7.4	7.8	1.40

Date	BOD$_5$, mg/L		TSS, mg/L (3/W)		D.O., mg/L	TKN, mg/L (3/W)	Temperature, °F			pH, Standard Units		Ammonia, mg/L (1/M)
	Reported	Limitation	Reported	Limitation	Minimum	Weekly Average	Minimum	Average	Maximum	Minimum	Maximum	Monthly Average
	Monthly Averages											
November	3.9	49.4	11.3	49.3	7.4	2.88	64.4	74.5	82.4	7.2	7.8	<0.20
December	10.2	49.5	26.1	49.5	7.4	5.09	68.0	72.4	78.8	7.5	7.9	0.70
2008												
January	12.9	49.4	23.2	49.4	7.7	6.33	60.8	70.5	80.6	7.1	7.8	0.50
February	9.7	49.4	24.8	49.5	7.6	4.36	66.2	71.9	78.8	7.2	7.8	<0.20
March	8.6	49.3	19.5	49.3	7.2	4.12	68.0	74.1	82.4	7.2	7.8	<0.20
April	8.1	49.1	23.3	49.1	7.1	3.63	69.8	77.4	84.2	7.3	7.9	<0.20
May	7.7	48.9	28.5	48.9	6.9	7.42	68.0	78.4	87.8	7.2	7.9	1.50
June	6.8	48.2	12.6	48.2	6.6	3.35	80.6	86.5	91.4	6.9	7.9	0.50
Average	8.0	48.4	16.7	48.7	7.1	4.38	69.5	78.1	85.7	7.2	7.8	0.84
Maximum	15.8	49.5	28.5	49.5	8.2	10.48	84.6	91.9	96.8	7.6	7.9	3.30
Minimum	2.2	40.9	6.2	46.5	6.5	2.29	53.6	66.8	75.2	6.9	7.6	0.20
						90th percentile	80.6	87.0	93.2	7.4	7.9	
						10th percentile	59.9	69.6	78.8	7.1	7.7	
							(See below for temperatures in °C)					
Effluent Limitation:		48.4		48.7	6.5	13.0		NL	NL	6.00	9.00	NL
Ratio (in %) of actual value to limitation (using average values above):												
		16.5		34.3	100	33.7				N/A	N/A	
Baseline		1 / Day		1 / Day	1 / Day	1 / Day				1 / Day	1 / Day	
Allowable reduction in monitoring frequency:												
		1 / Week		3 / Week	No reductiion	3 / Week				Not applicable		

	Temperature, °C		
	Minimum	Average	Maximum
Average	20.8	25.6	29.8
Maximum	29.2	33.3	36
Minimum	12	19.3	24
90th percentile	27	30.6	34
10th percentile	15.5	20.9	26

Attachment 6C

DMR data for Outfalls 101 and 102

Attachment 6C

Date	Outfall 101		Outfall 201	
Date	BOD_5, mg/L (5/W)	TSS, mg/L (3/W)	BOD_5, mg/L (5/W)	TSS, mg/L (3/W)
	Monthly Averages			
2005				
July	4.5	9.2	8.6	18.2
August	3.6	10.3	11.1	22.4
September	2.8	14.0	7.7	16.2
October	0.5	8.2	5.6	15.6
November	2.3	6.5	7.0	19.0
December	2.3	17.1	9.1	23.0
2006				
January	1.5	17.8	6.1	15.9
February	0.8	14.3	9.6	14.1
March	4.3	13.1	5.3	14.1
April	7.4	11.6	7.5	15.4
May	6.0	9.9	3.3	6.6
June	4.4	11.3	8.7	16.2
July	5.1	12.6	11.5	14.4
August	6.4	17.7	12.4	15.6
September	2.6	12.4	10.6	16.6
October	1.6	10.4	6.9	15.1
November	4.3	12.3	9.4	21.3
December	1.0	13.9	8.7	18.5
2007				
January	1.1	16.8	3.5	12.1
February	1.9	12.2	9.2	21.1
March	0.2	10.1	7.2	16.5
April	6.4	10.0	1.7	8.1
May	4.4	8.1	4.8	7.1
June	4.3	13.0	12.7	17.9
July	7.5	16.8	3.5	11.5
August	0.6	6.6	4.3	15.6
September	3.0	11.4	9.8	15.2
October	1.1	9.1	2.9	10.5
November	5.2	23.1	2.6	9.5
December	4.7	22.3	8.2	27.7
2008				
January	4.8	20.5	7.5	20.5
February	1.9	12.0	9.6	25.8
March	3.8	12.6	9.1	20.5
April	3.5	12.4	8.5	19.9
May	3.7	9.8	8.0	25.4
June	4.6	10.1	7.1	14.2
Average	3.4	12.8	7.5	16.6
Maximum	7.5	23.1	12.7	27.7
Minimum	0.2	6.5	1.7	6.6
Limitation	30	30	50	50
% of actual average versus limitation	11.3	42.7	15.0	33.2

Baseline monitoring	1 / Day	1 / Day	1 / Day	1 / Day
Allowable reduction in monitoring frequency:				
	1 / Week	3 / Week	1 / Week	3 / Week

Attachment 7

Effluent Limitation Development

Attachment 7

The data summarized in the following table were provided in the permit renewal application. The data are summarized in Attachment 6A.

If data were reported at less than a quantification level (QL) equal to or less than the required QL, the parameter was considered absent for the purpose of this evaluation. All uncensored values (that is, not a "less than" value) were evaluated in regard to the need for a water quality based effluent limitation. The parameters requiring evaluation, which are indicated in bold type in the following table are ammonia (see Attachment 6B for effluent ammonia data), copper, lead, zinc, chloride, chlorine, and cyanide.

Included in this attachment are:

a. "Mixing Zone Predictions...". This analysis uses statistical flows and basic information about the receiving stream to predict mixing patterns in-stream.

   These pages (and others) are identified in the first line as either "existing" or "expansion". The "existing" condition uses an effluent flow of 5.8 MGD. The "expansion" condition uses and effluent flow of 6.34 MGD.

b. Spreadsheets titled "Water Quality Standards and Wasteload Allocations" (also known as MSTRANTI). These spreadsheets calculate the water quality standards and wasteload allocations given inputs for effluent and stream flow, pH, temperature, and hardness, and other stream characteristics. See Attachment 3 for stream data.

c. Calculation sheets ("STATS") that present a reasonable potential analysis of the listed data to determine if a water quality based effluent limitation is needed. The wasteload allocations from MSTRANTI are used in these analyses.

d. The following table shows a comparison of reported data to applicable human health wasteload allocations. No limitations are required to protect human health.

Parameter	**Outfall 001**	
	Expected Value*	WLA_{hh}**
Cyanide (µg/L)	10.5	1,300,000
Dissolved Zinc (µg/L)	133.9	430,000
Dioxin*** (ppq)	10.1	49

* See STATS printouts in this attachment.

** Taken from the MSTRANTI spreadsheet for the expansion flow (see Attachment 14), which is conservative for the existing condition.

*** The required QL for the dioxin testing was 10 ppq. Dioxin was reported as < 10.1 ppq. Dioxin is associated with the production of Kraft paper using chlorine. Bear Island is not a Kraft mill and no Kraft paper is presently used at the mill (although Special Condition 12 acknowledges that up to 10% purchased Kraft could be imported). The reported result of < 10.1 ppq is therefore, a reasonable indication that dioxin can be considered absent in this effluent. As presented in the table above however, if dioxin was present at a concentration of 10.1 ppq, a limitation would not be needed. Note that the dioxin standard applies at the mean annual stream flow. The annual mean for Water Years 1980 through 2007 is 387 cfs (250 MGD). The above WLA_{HH} was obtained using the MSTRANTI spreadsheet with an effluent flow of 6.34 MGD and stream flow of 250 MGD.

Mixing Zone Predictions for Doswell WWTP existing

Effluent Flow = 5.8 MGD
Stream 7Q10 = 29 MGD
Stream 30Q10 = 32 MGD
Stream 1Q10 = 27 MGD
Stream slope = 0.00038 ft/ft
Stream width = 75 ft
Bottom scale = 2
Channel scale = 1

Mixing Zone Predictions @ 7Q10

Depth = 1.5301 ft
Length = 5044.68 ft
Velocity = .4694 ft/sec
Residence Time = .1244 days

Recommendation:

A complete mix assumption is appropriate for this situation and the entire 7Q10 may be used.

Mixing Zone Predictions @ 30Q10

Depth = 1.6092 ft
Length = 4830.64 ft
Velocity = .4848 ft/sec
Residence Time = .1153 days

Recommendation:

A complete mix assumption is appropriate for this situation and the entire 30Q10 may be used.

Mixing Zone Predictions @ 1Q10

Depth = 1.4758 ft
Length = 5203.82 ft
Velocity = .4587 ft/sec
Residence Time = 3.1514 hours

Recommendation:

A complete mix assumption is appropriate for this situation providing no more than 31.73% of the 1Q10 is used.

FRESHWATER
WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: Doswell WWTP existing   Permit No.: VA0029521

Receiving Stream: North Anna River   Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information		Stream Flows		Mixing Information		Effluent Information	
Mean Hardness (as CaCO3) =	19.4 mg/L	1Q10 (Annual) =	27 MGD	Annual - 1Q10 Mix =	31.73 %	Mean Hardness (as CaCO3) =	562 mg/L
90% Temperature (Annual) =	26.2 deg C	7Q10 (Annual) =	29 MGD	- 7Q10 Mix =	100 %	90% Temp (Annual) =	30.6 deg C
90% Temperature (Wet season) =	deg C	30Q10 (Annual) =	32 MGD	- 30Q10 Mix =	100 %	90% Temp (Wet season) =	deg C
90% Maximum pH =	7.4 SU	1Q10 (Wet season) =	0 MGD	Wet Season - 1Q10 Mix =	%	90% Maximum pH =	7.9 SU
10% Maximum pH =	6.4 SU	30Q10 (Wet season)	0 MGD	- 30Q10 Mix =	%	10% Maximum pH =	7.7 SU
Tier Designation (1 or 2) =	1	30Q5 =	33 MGD			Discharge Flow =	5.8 MGD
Public Water Supply (PWS) Y/N? =	n	Harmonic Mean =	81 MGD				
Trout Present Y/N? =	n	Annual Average =	MGD				
Early Life Stages Present Y/N? =	y						

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Acenapthene	0	--	--	na	2.7E+03	--	--	na	1.8E+04	--	--	--	--	--	--	--	--	--	--	na	1.8E+04
Acrolein	0	--	--	na	7.8E+02	--	--	na	5.2E+03	--	--	--	--	--	--	--	--	--	--	na	5.2E+03
Acrylonitrile C	0	--	--	na	6.6E+00	--	--	na	9.9E+01	--	--	--	--	--	--	--	--	--	--	na	9.9E+01
Aldrin C	0	3.0E+00	--	na	1.4E-03	7.4E+00	--	na	2.1E-02	--	--	--	--	--	--	--	--	7.4E+00	--	na	2.1E-02
Ammonia-N (mg/l) (Yearly)	0	1.87E+01	2.06E+00	na	--	4.6E+01	1.3E+01	na	--	--	--	--	--	--	--	--	--	4.6E+01	1.3E+01	na	--
Ammonia-N (mg/l) (High Flow)	0	1.01E+01	2.80E+00	na	--	1.0E+01	2.8E+00	na	--	--	--	--	--	--	--	--	--	1.0E+01	2.8E+00	na	--
Anthracene	0	--	--	na	1.1E+05	--	--	na	7.4E+05	--	--	--	--	--	--	--	--	--	--	na	7.4E+05
Antimony	0	--	--	na	4.3E+03	--	--	na	2.9E+04	--	--	--	--	--	--	--	--	--	--	na	2.9E+04
Arsenic	0	3.4E+02	1.5E+02	na	--	8.4E+02	9.0E+02	na	--	--	--	--	--	--	--	--	--	8.4E+02	9.0E+02	na	--
Barium	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Benzene C	0	--	--	na	7.1E+02	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
Benzidine C	0	--	--	na	5.4E-03	--	--	na	8.1E-02	--	--	--	--	--	--	--	--	--	--	na	8.1E-02
Benzo (a) anthracene C	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	--	--	na	7.3E+00
Benzo (b) fluoranthene C	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	--	--	na	7.3E+00
Benzo (k) fluoranthene C	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	--	--	na	7.3E+00
Benzo (a) pyrene C	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	--	--	na	7.3E+00
Bis2-Chloroethyl Ether	0	--	--	na	1.4E+01	--	--	na	9.4E+01	--	--	--	--	--	--	--	--	--	--	na	9.4E+01
Bis2-Chloroisopropyl Ether	0	--	--	na	1.7E+05	--	--	na	1.1E+06	--	--	--	--	--	--	--	--	--	--	na	1.1E+06
Bromoform C	0	--	--	na	3.6E+03	--	--	na	5.4E+04	--	--	--	--	--	--	--	--	--	--	na	5.4E+04
Butylbenzylphthalate	0	--	--	na	5.2E+03	--	--	na	3.5E+04	--	--	--	--	--	--	--	--	--	--	na	3.5E+04
Cadmium	0	1.0E+01	1.2E+00	na	--	2.6E+01	7.3E+00	na	--	--	--	--	--	--	--	--	--	2.6E+01	7.3E+00	na	--
Carbon Tetrachloride C	0	--	--	na	4.4E+01	--	--	na	6.6E+02	--	--	--	--	--	--	--	--	--	--	na	6.6E+02
Chlordane C	0	2.4E+00	4.3E-03	na	2.2E-02	5.9E+00	2.6E-02	na	3.3E-01	--	--	--	--	--	--	--	--	5.9E+00	2.6E-02	na	3.3E-01
Chloride	0	8.6E+05	2.3E+05	na	--	2.1E+06	1.4E+06	na	--	--	--	--	--	--	--	--	--	2.1E+06	1.4E+06	na	--
TRC	0	1.9E+01	1.1E+01	na	--	4.7E+01	6.6E+01	na	--	--	--	--	--	--	--	--	--	4.7E+01	6.6E+01	na	--
Chlorobenzene	0	--	--	na	2.1E+04	--	--	na	1.4E+05	--	--	--	--	--	--	--	--	--	--	na	1.4E+05

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane^{C}	0	--	--	na	3.4E+02	--	--	na	5.1E+03	--	--	--	--	--	--	--	--	--	--	na	5.1E+03
Chloroform ^{C}	0	--	--	na	2.9E+04	--	--	na	4.3E+05	--	--	--	--	--	--	--	--	--	--	na	4.3E+05
2-Chloronaphthalene	0	--	--	na	4.3E+03	--	--	na	2.9E+04	--	--	--	--	--	--	--	--	--	--	na	2.9E+04
2-Chlorophenol	0	--	--	na	4.0E+02	--	--	na	2.7E+03	--	--	--	--	--	--	--	--	--	--	na	2.7E+03
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	2.1E-01	2.5E-01	na	--	--	--	--	--	--	--	--	--	2.1E-01	2.5E-01	na	--
Chromium III	0	1.2E+03	8.0E+01	na	--	2.9E+03	4.8E+02	na	--	--	--	--	--	--	--	--	--	2.9E+03	4.8E+02	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	4.0E+01	6.6E+01	na	--	--	--	--	--	--	--	--	--	4.0E+01	6.6E+01	na	--
Chromium, Total	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene ^{C}	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	--	--	na	7.3E+00
Copper	0	3.0E+01	9.7E+00	na	--	7.5E+01	5.8E+01	na	--	--	--	--	--	--	--	--	--	7.5E+01	5.8E+01	na	--
Cyanide	0	2.2E+01	5.2E+00	na	2.2E+05	5.4E+01	3.1E+01	na	1.4E+06	--	--	--	--	--	--	--	--	5.4E+01	3.1E+01	na	1.4E+06
DDD ^{C}	0	--	--	na	8.4E-03	--	--	na	1.3E-01	--	--	--	--	--	--	--	--	--	--	na	1.3E-01
DDE ^{C}	0	--	--	na	5.9E-03	--	--	na	8.8E-02	--	--	--	--	--	--	--	--	--	--	na	8.8E-02
DDT ^{C}	0	1.1E+00	1.0E-03	na	5.9E-03	2.7E+00	6.0E-03	na	8.8E-02	--	--	--	--	--	--	--	--	2.7E+00	6.0E-03	na	8.8E-02
Demeton	0	--	1.0E-01	na	--	--	6.0E-01	na	--	--	--	--	--	--	--	--	--	--	6.0E-01	na	--
Dibenz(a,h)anthracene ^{C}	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	--	--	na	7.3E+00
Dibutyl phthalate	0	--	--	na	1.2E+04	--	--	na	8.0E+04	--	--	--	--	--	--	--	--	--	--	na	8.0E+04
Dichloromethane (Methylene Chloride) ^{C}	0	--	--	na	1.6E+04	--	--	na	2.4E+05	--	--	--	--	--	--	--	--	--	--	na	2.4E+05
1,2-Dichlorobenzene	0	--	--	na	1.7E+04	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
1,3-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
1,4-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
3,3-Dichlorobenzidine^{C}	0	--	--	na	7.7E-01	--	--	na	1.2E+01	--	--	--	--	--	--	--	--	--	--	na	1.2E+01
Dichlorobromomethane ^{C}	0	--	--	na	4.6E+02	--	--	na	6.9E+03	--	--	--	--	--	--	--	--	--	--	na	6.9E+03
1,2-Dichloroethane ^{C}	0	--	--	na	9.9E+02	--	--	na	1.5E+04	--	--	--	--	--	--	--	--	--	--	na	1.5E+04
1,1-Dichloroethylene	0	--	--	na	1.7E+04	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
1,2-trans-dichloroethylene	0	--	--	na	1.4E+05	--	--	na	9.4E+05	--	--	--	--	--	--	--	--	--	--	na	9.4E+05
2,4-Dichlorophenol	0	--	--	na	7.9E+02	--	--	na	5.3E+03	--	--	--	--	--	--	--	--	--	--	na	5.3E+03
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane^{C}	0	--	--	na	3.9E+02	--	--	na	5.8E+03	--	--	--	--	--	--	--	--	--	--	na	5.8E+03
1,3-Dichloropropene	0	--	--	na	1.7E+03	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
Dieldrin ^{C}	0	2.4E-01	5.6E-02	na	1.4E-03	5.9E-01	3.4E-01	na	2.1E-02	--	--	--	--	--	--	--	--	5.9E-01	3.4E-01	na	2.1E-02
Diethyl Phthalate	0	--	--	na	1.2E+05	--	--	na	8.0E+05	--	--	--	--	--	--	--	--	--	--	na	8.0E+05
Di-2-Ethylhexyl Phthalate ^{C}	0	--	--	na	5.9E+01	--	--	na	8.8E+02	--	--	--	--	--	--	--	--	--	--	na	8.8E+02
2,4-Dimethylphenol	0	--	--	na	2.3E+03	--	--	na	1.5E+04	--	--	--	--	--	--	--	--	--	--	na	1.5E+04
Dimethyl Phthalate	0	--	--	na	2.9E+06	--	--	na	1.9E+07	--	--	--	--	--	--	--	--	--	--	na	1.9E+07
Di-n-Butyl Phthalate	0	--	--	na	1.2E+04	--	--	na	8.0E+04	--	--	--	--	--	--	--	--	--	--	na	8.0E+04
2,4 Dinitrophenol	0	--	--	na	1.4E+04	--	--	na	9.4E+04	--	--	--	--	--	--	--	--	--	--	na	9.4E+04
2-Methyl-4,6-Dinitrophenol	0	--	--	na	7.65E+02	--	--	na	5.1E+03	--	--	--	--	--	--	--	--	--	--	na	5.1E+03
2,4-Dinitrotoluene ^{C}	0	--	--	na	9.1E+01	--	--	na	1.4E+03	--	--	--	--	--	--	--	--	--	--	na	1.4E+03
Dioxin (2,3,7,8-tetrachlorodibenzo-p-dioxin) (ppq)	0	--	--	na	1.2E-06	--	--	na	na	--	--	--	--	--	--	--	--	--	--	na	na
1,2-Diphenylhydrazine^{C}	0	--	--	na	5.4E+00	--	--	na	8.1E+01	--	--	--	--	--	--	--	--	--	--	na	8.1E+01
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	5.4E-01	3.4E-01	na	1.6E+03	--	--	--	--	--	--	--	--	5.4E-01	3.4E-01	na	1.6E+03
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	5.4E-01	3.4E-01	na	1.6E+03	--	--	--	--	--	--	--	--	5.4E-01	3.4E-01	na	1.6E+03
Endosulfan Sulfate	0	--	--	na	2.4E+02	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	--	--	na	1.6E+03
Endrin	0	8.6E-02	3.6E-02	na	8.1E-01	2.1E-01	2.2E-01	na	5.4E+00	--	--	--	--	--	--	--	--	2.1E-01	2.2E-01	na	5.4E+00
Endrin Aldehyde	0	--	--	na	8.1E-01	--	--	na	5.4E+00	--	--	--	--	--	--	--	--	--	--	na	5.4E+00

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	**Acute**	**Chronic**	**HH (PWS)**	**HH**
Ethylbenzene	0	--	--	na	2.9E+04	--	--	na	1.9E+05	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.9E+05**
Fluoranthene	0	--	--	na	3.7E+02	--	--	na	2.5E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.5E+03**
Fluorene	0	--	--	na	1.4E+04	--	--	na	9.4E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**9.4E+04**
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Guthion	0	--	1.0E-02	na	--	--	6.0E-02	na	--	--	--	--	--	--	--	--	--	**--**	**6.0E-02**	**na**	**--**
Heptachlor [C]	0	5.2E-01	3.8E-03	na	2.1E-03	1.3E+00	2.3E-02	na	3.1E-02	--	--	--	--	--	--	--	--	**1.3E+00**	**2.3E-02**	**na**	**3.1E-02**
Heptachlor Epoxide[C]	0	5.2E-01	3.8E-03	na	1.1E-03	1.3E+00	2.3E-02	na	1.6E-02	--	--	--	--	--	--	--	--	**1.3E+00**	**2.3E-02**	**na**	**1.6E-02**
Hexachlorobenzene[C]	0	--	--	na	7.7E-03	--	--	na	1.2E-01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.2E-01**
Hexachlorobutadiene[C]	0	--	--	na	5.0E+02	--	--	na	7.5E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**7.5E+03**
Hexachlorocyclohexane Alpha-BHC[C]	0	--	--	na	1.3E-01	--	--	na	1.9E+00	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.9E+00**
Hexachlorocyclohexane Beta-BHC[C]	0	--	--	na	4.6E-01	--	--	na	6.9E+00	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.9E+00**
Hexachlorocyclohexane Gamma-BHC[C] (Lindane)	0	9.5E-01	na	na	6.3E-01	2.4E+00	--	na	9.4E+00	--	--	--	--	--	--	--	--	**2.4E+00**	**--**	**na**	**9.4E+00**
Hexachlorocyclopentadiene	0	--	--	na	1.7E+04	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.1E+05**
Hexachloroethane[C]	0	--	--	na	8.9E+01	--	--	na	1.3E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.3E+03**
Hydrogen Sulfide	0	--	2.0E+00	na	--	--	1.2E+01	na	--	--	--	--	--	--	--	--	--	**--**	**1.2E+01**	**na**	**--**
Indeno (1,2,3-cd) pyrene [C]	0	--	--	na	4.9E-01	--	--	na	7.3E+00	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**7.3E+00**
Iron	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Isophorone[C]	0	--	--	na	2.6E+04	--	--	na	3.9E+05	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**3.9E+05**
Kepone	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	**--**	**0.0E+00**	**na**	**--**
Lead	0	3.6E+02	1.5E+01	na	--	8.9E+02	9.1E+01	na	--	--	--	--	--	--	--	--	--	**8.9E+02**	**9.1E+01**	**na**	**--**
Malathion	0	--	1.0E-01	na	--	--	6.0E-01	na	--	--	--	--	--	--	--	--	--	**--**	**6.0E-01**	**na**	**--**
Manganese	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Mercury	0	1.4E+00	7.7E-01	na	5.1E-02	3.5E+00	4.6E+00	na	3.4E-01	--	--	--	--	--	--	--	--	**3.5E+00**	**4.6E+00**	**na**	**3.4E-01**
Methyl Bromide	0	--	--	na	4.0E+03	--	--	na	2.7E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.7E+04**
Methoxychlor	0	--	3.0E-02	na	--	--	1.8E-01	na	--	--	--	--	--	--	--	--	--	**--**	**1.8E-01**	**na**	**--**
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	**--**	**0.0E+00**	**na**	**--**
Monochlorobenzene	0	--	--	na	2.1E+04	--	--	na	1.4E+05	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.4E+05**
Nickel	0	3.8E+02	2.2E+01	na	4.6E+03	9.4E+02	1.3E+02	na	3.1E+04	--	--	--	--	--	--	--	--	**9.4E+02**	**1.3E+02**	**na**	**3.1E+04**
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Nitrobenzene	0	--	--	na	1.9E+03	--	--	na	1.3E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.3E+04**
N-Nitrosodimethylamine[C]	0	--	--	na	8.1E+01	--	--	na	1.2E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.2E+03**
N-Nitrosodiphenylamine[C]	0	--	--	na	1.6E+02	--	--	na	2.4E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.4E+03**
N-Nitrosodi-n-propylamine[C]	0	--	--	na	1.4E+01	--	--	na	2.1E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.1E+02**
Parathion	0	6.5E-02	1.3E-02	na	--	1.6E-01	7.8E-02	na	--	--	--	--	--	--	--	--	--	**1.6E-01**	**7.8E-02**	**na**	**--**
PCB-1016	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB-1221	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB-1232	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB-1242	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB-1248	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB-1254	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB-1260	0	--	1.4E-02	na	--	--	8.4E-02	na	--	--	--	--	--	--	--	--	--	**--**	**8.4E-02**	**na**	**--**
PCB Total[C]	0	--	--	na	1.7E-03	--	--	na	2.5E-02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.5E-02**

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				**Most Limiting Allocations**			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	**Acute**	**Chronic**	**HH (PWS)**	**HH**
Pentachlorophenol C	0	5.9E+00	3.9E+00	na	8.2E+01	1.5E+01	2.4E+01	na	1.2E+03	--	--	--	--	--	--	--	--	**1.5E+01**	**2.4E+01**	**na**	**1.2E+03**
Phenol	0	--	--	na	4.6E+06	--	--	na	3.1E+07	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**3.1E+07**
Pyrene	0	--	--	na	1.1E+04	--	--	na	7.4E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**7.4E+04**
Radionuclides (pCi/l except Beta/Photon)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Gross Alpha Activity	0	--	--	na	1.5E+01	--	--	na	1.0E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.0E+02**
Beta and Photon Activity (mrem/yr)	0	--	--	na	4.0E+00	--	--	na	2.7E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**2.7E+01**
Strontium-90	0	--	--	na	8.0E+00	--	--	na	5.4E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**5.4E+01**
Tritium	0	--	--	na	2.0E+04	--	--	na	1.3E+05	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.3E+05**
Selenium	0	2.0E+01	5.0E+00	na	1.1E+04	5.0E+01	3.0E+01	na	7.4E+04	--	--	--	--	--	--	--	--	**5.0E+01**	**3.0E+01**	**na**	**7.4E+04**
Silver	0	1.5E+01	--	na	--	3.8E+01	--	na	--	--	--	--	--	--	--	--	--	**3.8E+01**	**--**	**na**	**--**
Sulfate	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
1,1,2,2-Tetrachloroethane C	0	--	--	na	1.1E+02	--	--	na	1.6E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.6E+03**
Tetrachloroethylene C	0	--	--	na	8.9E+01	--	--	na	1.3E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.3E+03**
Thallium	0	--	--	na	6.3E+00	--	--	na	4.2E+01	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**4.2E+01**
Toluene	0	--	--	na	2.0E+05	--	--	na	1.3E+06	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.3E+06**
Total dissolved solids	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Toxaphene C	0	7.3E-01	2.0E-04	na	7.5E-03	1.8E+00	1.2E-03	na	1.1E-01	--	--	--	--	--	--	--	--	**1.8E+00**	**1.2E-03**	**na**	**1.1E-01**
Tributyltin	0	4.6E-01	6.3E-02	na	--	1.1E+00	3.8E-01	na	--	--	--	--	--	--	--	--	--	**1.1E+00**	**3.8E-01**	**na**	**--**
1,2,4-Trichlorobenzene	0	--	--	na	9.4E+02	--	--	na	6.3E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.3E+03**
1,1,2-Trichloroethane C	0	--	--	na	4.2E+02	--	--	na	6.3E+03	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**6.3E+03**
Trichloroethylene C	0	--	--	na	8.1E+02	--	--	na	1.2E+04	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**1.2E+04**
2,4,6-Trichlorophenol C	0	--	--	na	6.5E+01	--	--	na	9.7E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**9.7E+02**
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**--**
Vinyl Chloride C	0	--	--	na	6.1E+01	--	--	na	9.1E+02	--	--	--	--	--	--	--	--	**--**	**--**	**na**	**9.1E+02**
Zinc	0	2.4E+02	1.3E+02	na	6.9E+04	6.1E+02	7.7E+02	na	4.6E+05	--	--	--	--	--	--	--	--	**6.1E+02**	**7.7E+02**	**na**	**4.6E+05**

Notes:

1. All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
2. Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
3. Metals measured as Dissolved, unless specified otherwise
4. "C" indicates a carcinogenic parameter
5. Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information. Antidegradation WLAs are based upon a complete mix.
6. Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
   = (0.1(WQC - background conc.) + background conc.) for human health
7. WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens, Harmonic Mean for Carcinogens, and Annual Average for Dioxin. Mixing ratios may be substituted for stream flows where appropriate.

Metal	Target Value (SSTV)
Antimony	2.9E+04
Arsenic	3.4E+02
Barium	na
Cadmium	4.4E+00
Chromium III	2.9E+02
Chromium VI	1.6E+01
Copper	3.0E+01
Iron	na
Lead	5.5E+01
Manganese	na
Mercury	3.4E-01
Nickel	7.9E+01
Selenium	1.8E+01
Silver	1.5E+01
Zinc	2.4E+02

Note: do not use QL's lower than the minimum QL's provided in agency guidance

Facility = Doswell WWTP existing
Chemical = Ammonia
Chronic averaging period = 30
WLAa = 46
WLAc = 13
Q.L. = .2
# samples/mo. = 12
# samples/wk. = 3

Summary of Statistics:

observations = 1
Expected Value = 7.8
Variance = 21.9024
C.V. = 0.6
97th percentile daily values = 18.9806
97th percentile 4 day average = 12.9775
97th percentile 30 day average = 9.40721
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

7.8

Guidance Memorandum No. 00-2011 directs that an ammonia effluent concentration of 9 mg/L be used to evaluate the need for an ammonia limitation for a municipal discharge. Although this discharge consists predominantly of industrial wastewater, it is reasonable to check to see if the cited guidance would result in a limitation. In this case, the permit already limits TKN to 13 mg/L. Ammonia typically makes up 40% to 60% of the TKN in a municipal effluent. Ammonia makes up 46% of the TKN in the Bear Island wastewater (see "Outfall 001 – Supplement to Table I"). Using 60% as a worse case scenario, the ammonia concentration could be as high 7.8 mg/L, which is the concentration used in the above analysis (13 x 0.6 = 7.8). The above result that "no limit is required" establishes that the TKN limitation is also protective of the ammonia water quality standard. (See Attachment 6B for ammonia data on Outfall 001.)

Facility = Doswell WWTP existing
Chemical = Chloride
Chronic averaging period = 4
WLAa = 2100000
WLAc = 1400000
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 29000
Variance = 3027600
C.V. = 0.6
97th percentile daily values = 70569.1
97th percentile 4 day average = 48249.9
97th percentile 30 day average = 34975.5
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

29000

Facility = Doswell WWTP existing
Chemical = Total Residual Chlorine
Chronic averaging period = 4
WLAa = 47
WLAc = 66
Q.L. = 0.1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 3
Expected Value = 360
Variance = 46656
C.V. = 0.6
97th percentile daily values = 876.030
97th percentile 4 day average = 598.964
97th percentile 30 day average = 434.179
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Acute Toxicity

Maximum Daily Limit = 47
Average Weekly Limit = 47
Average Monthly Limit = 47

The data are:

190
410
480

Chlorine is not used for disinfection at the Doswell treatment plant and chlorine is not used in the Bear Island process. The above concentrations were determined in conjunction with the failed *Ceriodaphnia dubia* chronic bioassay test in March 2007 (see Attachment 8). These TRC concentrations are believed to be false positives due to possible interference by manganese or alkalinity. Because chlorine is not used at either site, limitations are not included in the draft permit. (It is not appropriate to "force" chlorine limitations with an input of value of 20,000 µg/L per Guidance Memorandum No. 00-2011 because chlorine is not added to the system at any point.)

Facility = Doswell WWTP existing
Chemical = Dissolved Copper
Chronic averaging period = 4
WLAa = 75
WLAc = 58
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 6
Variance = 12.96
C.V. = 0.6
97th percentile daily values = 14.6005
97th percentile 4 day average = 9.98274
97th percentile 30 day average = 7.23631
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

6

The dissolved copper data reported with the permit renewal application were 6 µg/L, <5 µg/L, and <5 µg/L (see Attachment 6A). In accordance with a memorandum dated January 29, 2003 from Allan Brockenbrough regarding mixed data sets that include censored data (values reported as less than a quantification limit (QL)) and uncensored data (>QL; i.e., a real number), the reasonable potential analysis is initially done using only the uncensored data. If limitations are not indicated, then the analysis is complete. That is the case with the copper data.

Facility = Doswell WWTP
Chemical = Cyanide
Chronic averaging period = 4
WLAa = 54
WLAc = 31
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 2
Expected Value = 10.5
Variance = 39.69
C.V. = 0.6
97th percentile daily values = 25.5508
97th percentile 4 day average = 17.4697
97th percentile 30 day average = 12.6635
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

11
10

The cyanide data reported with the permit renewal application were 11 µg/L, 10 µg/L, and <10 µg/L (see Attachment 6A). In accordance with a memorandum dated January 29, 2003 from Allan Brockenbrough regarding mixed data sets that include censored data (values reported as less than a quantification limit (QL)) and uncensored data (>QL; i.e., a real number), the reasonable potential analysis is initially done using only the uncensored data. If limitations are not indicated, then the analysis is complete. That is the case with the cyanide data. Note in Attachment 6A that a cyanide study was conducted starting in March 2004 and ending in October 2005. The above data are consistent with the data collected during that study period. Although the data from the cyanide study are more than three years old, they are still representative and could have been included in the above analysis. The above analysis using only two data points is a more extreme analysis however, which indicates that limitations are not needed.

Facility = Doswell WWTP existing
Chemical = Dissolved Lead
Chronic averaging period = 4
WLAa = 890
WLAc = 91
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 30
Variance = 324
C.V. = 0.6
97th percentile daily values = 73.0025
97th percentile 4 day average = 49.9137
97th percentile 30 day average = 36.1815
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

30

The dissolved lead data reported with the permit renewal application were (all in µg/L): <20, <20, 30, <20, <20, <20, <20, <20, <20, and <20 (see Attachment 6A). In accordance with a memorandum dated January 29, 2003 from Allan Brockenbrough regarding mixed data sets that include censored data (values reported as less than a quantification limit (QL)) and uncensored data (>QL; i.e., a real number), the reasonable potential analysis is initially done using only the uncensored data. If limitations are not indicated, then the analysis is complete. That is the case with the lead data.

Facility = Doswell WWTP existing
Chemical = Dissolved Zinc
Chronic averaging period = 4
WLAa = 610
WLAc = 770
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 11
Expected Value = 133.937
Variance = 1605.77
C.V. = 0.299185
97th percentile daily values = 222.573
97th percentile 4 day average = 175.236
97th percentile 30 day average = 147.698
< Q.L. = 0
Model used = lognormal

No Limit is required for this material

The data are:

108
101
134
218
173
98
113
110
104
109
204

Attachment 8

WET Evaluation

Attachment 8

VPDES Permit VA00029521 – Doswell Wastewater Treatment Plant

Results of acute toxicity tests during term of current permit:

Permit endpoints: $LC_{50} \geq 100\%$
NOEC $\geq$ 21% at 5.8 MGD

TEST DATE	*Ceriodaphnia dubia*		*Pimephales promelas*		Laboratory
	LC_{50}	PERCENT SURVIVAL IN 100% EFFLUENT	LC_{50}	PERCENT SURVIVAL IN 100% EFFLUENT	
February 2004	>100	100	>100	95	Coastal Bioanalysts
April 2005	>100	100	>100	100	J. R. Reed
April 2006	>100	100	>100	100	J. R. Reed
March 2007	>100	100	>100	100	J. R. Reed
February 2008	>100	100	>100	100	J. R. Reed

Results of chronic toxicity tests during term of current permit:

TEST DATE**	*Ceriodaphnia dubia*		*Pimephales promelas*		Laboratory
	Survival	Reproduction	Survival	Reproduction	
February 2004	100	61	100	100	Coastal Bioanalysts
April 2005	100	50	100	100	J. R. Reed
April 2006	invalid		100	100	J. R. Reed
May 2006 (1)	100	50			J. R. Reed
March 2007	100	<6.25 (2)	100	100	J. R. Reed
April 2007 (1)	100	100			J. R. Reed
April 2007 (1)	100	100			Coastal Bioanalysts
February 2008	100	<4 (3)	100	100	J. R. Reed
April 2008 (1)	100	100 (4)			J. R. Reed
April 2008 (1)	100	100			Coastal Bioanalysts

(1) Retest
(2) Total residual chlorine concentrations were detected in the samples received at the laboratory. Those concentrations were determined to be false positives; chlorine is not used for disinfection of final effluent. Also, subsequent screening tests at Bear Island did not indicate toxicity.
(3) Laboratory noted presence of large brown cotton shaped solids that surrounded the *C. dubia* during the test period.
(4) Laboratory noted presence of brown cotton shaped solids in one of the three samples collected for the test. Also, total residual chlorine concentrations were detected in the samples received at the laboratory. Those concentrations are considered to be false positives.

Discussion

Acute toxicity is not indicated.

Chronic toxicity (reproduction effect) may be indicated. The retests however, did not confirm the toxic effects.

The proposed permit requires the continuation of annual acute and chronic WET testing with *Ceriodaphnia dubia* and *Pimephales promelas.* The results of those tests will be evaluated for reasonable potential at the conclusion of the permit term, or sooner if toxicity is noted, and appropriate effluent limitations established.

Spreadsheet for determination of WET test endpoints or WET limits

	Excel 97			Acute Endpoint/Permit Limit			Use as LC_{50} in Special Condition, as TUa on DMR					
	Revision Date: 01/10/05											
	File: WETLIM10.xls			ACUTE	100% =	NOAEC	LC_{50} =	NA	% Use as	NA	TUa	
	(MIX.EXE required also)											
				ACUTE WLAa		0.74312586	Note: Inform the permittee that if the mean of the data exceeds					
							this TUa:	1.0	a limit may result using WLA.EXE			
				Chronic Endpoint/Permit Limit			Use as NOEC in Special Condition, as TUc on DMR					
				CHRONIC	7.431258803	TU_c	NOEC =	14	% Use as	7.14	TU_c	
				BOTH*	7.431258803	TU_c	NOEC =	14	% Use as	7.14	TU_c	
Enter data in the cells with blue type:				AML	7.431258803	TU_c	NOEC =	14	% Use as	7.14	TU_c	
Entry Date:		08/13/08		ACUTE WLAa,c		7.43125862		Note: Inform the permittee that if the mean				
Facility Name:		Doswell WWTP		CHRONIC WLAc		6		of the data exceeds this TUc:			3.0538362	
VPDES Number:		VA0029521		* Both means acute expressed as chronic				a limit may result using WLA.EXE				
Outfall Number:		1										
				% Flow to be used from MIX.EXE				**Difuser /modeling study?**				
Plant Flow:		5.8	MGD					Enter Y/N	n			
Acute 1Q10:		27	MGD	31.73	%			Acute	1	:1		
Chronic 7Q10:		29	MGD	100	%			Chronic	1	:1		
Are data available to calculate CV? (Y/N)				N	(Minimum of 10 data points, same species, needed)					Go to Page 2		
Are data available to calculate ACR? (Y/N)				N	(NOEC<LC50, do not use greater/less than data)					Go to Page 3		
IWC_a		40.37001204	%	Plant flow/plant flow + 1Q10		NOTE: If the IWCa is >33%, specify the						
IWC_c		16.66666667	%	Plant flow/plant flow + 7Q10		NOAEC = 100% test/endpoint for use						
Dilution, acute		2.477086207	100/IWCa									
Dilution, chronic		6	100/IWCc									
WLA_a		0.743125862	Instream criterion (0.3 TUa) X's Dilution, acute									
WLA_c		6	Instream criterion (1.0 TUc) X's Dilution, chronic									
$WLA_{a,c}$		7.431258621	ACR X's WLA_a - converts acute WLA to chronic units									
ACR -acute/chronic ratio		10	LC50/NOEC (Default is 10 - if data are available, use tables Page 3)									
CV-Coefficient of variatior		0.6	Default of 0.6 - if data are available, use tables Page 2)									
Constants	eA	0.4109447	Default = 0.41									
	eB	0.6010373	Default = 0.60									
	eC	2.4334175	Default = 2.43									
	eD	2.4334175	Default = 2.43 (1 samp)		No. of sample	1	****The Maximum Daily Limit is calculated from the lowest					
							LTA, X's eC. The LTAa,c and MDL using it are driven by the ACR.**					
$LTA_{a,c}$		3.053836345	WLAa,c X's eA									
LTA_c		3.6062238	WLAc X's eB							Rounded NOEC's		%
MDL** with $LTA_{a,c}$		7.431258803	TU_c	NOEC =	13.456670	(Protects from acute/chronic toxicity)				NOEC =	14	%
MDL** with LTA_c		8.775448104	TU_c	NOEC =	11.395429	(Protects from chronic toxicity)				NOEC =	12	%
AML with lowest LTA		7.431258803	TU_c	NOEC =	13.456670	Lowest LTA X's eD				NOEC =	14	
IF ONLY ACUTE ENDPOINT/LIMIT IS NEEDED, CONVERT MDL FROM TU_c to TU_a												
										Rounded LC50's		%
MDL with $LTA_{a,c}$		0.74312588	TU_a	LC50 =	134.566704	%	Use NOAEC=100%			LC50 =	NA	%
MDL with LTA_c		0.87754481	TU_a	LC50 =	113.954295	%	Use NOAEC=100%			LC50 =	NA	

Page 2 - Follow the directions to develop a site specific CV (coefficient of variation)

IF YOU HAVE AT LEAST 10 DATA POINTS THAT					Vertebrate				Invertebrate	
ARE QUANTIFIABLE (NOT "<" OR ">")					IC_{25} Data				IC_{25} Data	
FOR A SPECIES, ENTER THE DATA IN EITHER					or				or	
COLUMN "G" (VERTEBRATE) OR COLUMN					LC_{50} Data	LN of data			LC_{50} Data	LN of data
"J" (INVERTEBRATE). THE 'CV' WILL BE					***********				************	
PICKED UP FOR THE CALCULATIONS				1	0			1	0	
BELOW. THE DEFAULT VALUES FOR eA,				2				2		
eB, AND eC WILL CHANGE IF THE 'CV' IS				3				3		
ANYTHING OTHER THAN 0.6.				4				4		
				5				5		
				6				6		
				7				7		
Coefficient of Variation for effluent tests				8				8		
				9				9		
CV =	0.6	(Default 0.6)		10				10		
				11				11		
δ^2 =	0.3074847			12				12		
δ =	0.554513029			13				13		
				14				14		
Using the log variance to develop eA				15				15		
	(P. 100, step 2a of TSD)			16				16		
Z = 1.881 (97% probability stat from table				17				17		
A =	-0.88929666			18				18		
eA =	0.410944686			19				19		
				20				20		
Using the log variance to develop eB										
	(P. 100, step 2b of TSD)			St Dev	NEED DATA	NEED DATA	St Dev		NEED DAT/	NEED DATA
δ_4^2 =	0.086177696			Mean	0	0	Mean		0	0
δ_4 =	0.293560379			Variance	0	0.000000	Variance		0	0.000000
B =	-0.50909823			CV	0		CV		0	
eB =	0.601037335									
Using the log variance to develop eC										
	(P. 100, step 4a of TSD)									
δ^2 =	0.3074847									
δ =	0.554513029									
C =	0.889296658									
eC =	2.433417525									
Using the log variance to develop eD										
	(P. 100, step 4b of TSD)									
n =	1	This number will most likely stay as "1", for 1 sample/month.								
δ_n^2 =	0.3074847									
δ_n =	0.554513029									
D =	0.889296658									
eD =	2.433417525									

Page 3 - Follow directions to develop a site specific ACR (Acute to Chronic Ratio)

To determine Acute/Chronic Ratio (ACR), insert usable data below. Usable data is defined as valid paired test results, acute and chronic, tested at the same temperature, same species. The chronic NOEC must be less than the acute LC_{50}, since the ACR divides the LC_{50} by the NOEC. LC_{50}'s >100% should not be used.

Table 1. ACR using Vertebrate data

Set #	LC_{50}	NOEC	Test ACR	Logarithm	Geomean	Antilog	ACR to Use
1	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
2	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
3	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
4	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
5	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
6	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
7	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
8	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
9	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
10	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
				ACR for vertebrate data:			0

Table 1. Result:	Vertebrate ACR	0
Table 2. Result:	Invertebrate ACR	0
	Lowest ACR	Default to 10

Table 2. ACR using Invertebrate data

Set #	LC_{50}	NOEC	Test ACR	Logarithm	Geomean	Antilog	ACR to Use
1	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
2	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
3	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
4	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
5	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
6	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
7	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
8	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
9	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
10	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
				ACR for vertebrate data:			0

Convert LC_{50}'s and NOEC's to Chronic TU's for use in WLA.EXE

Table 3. ACR used: 10

	Enter LC_{50}	TUc	Enter NOEC	TUc
1		NO DATA		NO DATA
2		NO DATA		NO DATA
3		NO DATA		NO DATA
4		NO DATA		NO DATA
5		NO DATA		NO DATA
6		NO DATA		NO DATA
7		NO DATA		NO DATA
8		NO DATA		NO DATA
9		NO DATA		NO DATA
10		NO DATA		NO DATA
11		NO DATA		NO DATA
12		NO DATA		NO DATA
13		NO DATA		NO DATA
14		NO DATA		NO DATA
15		NO DATA		NO DATA
16		NO DATA		NO DATA
17		NO DATA		NO DATA
18		NO DATA		NO DATA
19		NO DATA		NO DATA
20		NO DATA		NO DATA

If WLA.EXE determines that an acute limit is needed, you need to convert the TUc answer you get to TUa and then an LC50, enter it here:

NO DATA	$\%LC_{50}$
NO DATA	TUa

DILUTION SERIES TO RECOMMEND

Table 4.

	Monitoring % Effluent	Monitoring TUc	Limit % Effluent	Limit TUc
Dilution series based on data mean	32.7	3.0538362		
Dilution series to use for limit			14	7.1428571
Dilution factor to recommend:	0.5722386		0.3741657	
Dilution series to recommend:	100.0	1.00	100.0	1.00
	57.2	1.75	37.4	2.67
	32.7	3.05	14.0	7.14
	18.7	5.34	5.2	19.09
	10.72	9.33	2.0	51.02
Extra dilutions if needed	6.14	16.30	0.7	136.36
	3.51	28.48	0.3	364.43

Cell: I9
Comment:
This is assuming that the data are Type 2 data (none of the data in the data set are censored - "<" or ">").

Cell: K18
Comment: This is assuming that the data are Type 2 data (none of the data in the data set are censored - "<" or ">").

Cell: J22
Comment: Remember to change the "N" to "Y" if you have ratios entered, otherwise, they won't be used in the calculations.

Cell: C40
Comment:
If you have entered data to calculate an ACR on page 3, and this is still defaulted to "10", make sure you have selected "Y" in cell E21

Cell: C41
Comment: If you have entered data to calculate an effluent specific CV on page 2, and this is still defaulted to "0.6", make sure you have selected "Y" in cell E20

Cell: L48
Comment:
See Row 151 for the appropriate dilution series to use for these NOEC's

Cell: G62
Comment:
Vertebrates are:
Pimephales promelas
Oncorhynchus mykiss
Cyprinodon variegatus

Cell: J62
Comment:
Invertebrates are:
Ceriodaphnia dubia
Mysidopsis bahia

Cell: C117
Comment: Vertebrates are:

Pimephales promelas
Cyprinodon variegatus

Cell: M119
Comment: The ACR has been picked up from cell C34 on Page 1. If you have paired data to calculate an ACR, enter it in the tables to the left, and make sure you have a "Y" in cell E21 on Page 1. Otherwise, the default of 10 will be used to convert your acute data.

Cell: M121
Comment: If you are only concerned with acute data, you can enter it in the NOEC column for conversion and the number calculated will be equivalent to the TUa. The calculation is the same: 100/NOEC = TUc or 100/LC50 = TUa.

Cell: C138
Comment: Invertebrates are:

Ceriodaphnia dubia
Mysidopsis bahia

Spreadsheet for determination of WET test endpoints or WET limits

A	B	C	D	E	F	G	H	I	J	K	L	M
	Excel 97			Acute Endpoint/Permit Limit			Use as LC_{50} in Special Condition, as TUa on DMR					
	Revision Date: 01/10/05											
	File: WETLIM10.xls			ACUTE	100% =	NOAEC	LC_{50} =	NA	% Use as	NA	TUa	
	(MIX.EXE required also)											
				ACUTE WLAa		0.71151577	Note: Inform the permittee that if the mean of the data exceeds					
							this TUa:	1.0	a limit may result using WLA.EXE			
				Chronic Endpoint/Permit Limit			Use as NOEC in Special Condition, as TUc on DMR					
				CHRONIC	7.115157903	TU_c	NOEC =	15	% Use as	6.66	TU_c	
				BOTH*	7.115157903	TU_c	NOEC =	15	% Use as	6.66	TU_c	
Enter data in the cells with blue type:				AML	7.115157903	TU_c	NOEC =	15	% Use as	6.66	TU_c	
Entry Date:		08/13/08		ACUTE WLAa,c		7.11515773		Note: Inform the permittee that if the mean				
Facility Name:		Doswell WWTP		CHRONIC WLAc		5.57413249		of the data exceeds this TUc:			2.92393622	
VPDES Number:		VA0029521		* Both means acute expressed as chronic				a limit may result using WLA.EXE				
Outfall Number:		1										
				% Flow to be used from MIX.EXE				Difuser /modeling study?				
Plant Flow:		6.34	MGD					Enter Y/N	n			
Acute 1Q10:		27	MGD	32.21	%			Acute	1	:1		
Chronic 7Q10:		29	MGD	100	%			Chronic	1	:1		
Are data available to calculate CV? (Y/N)				N	(Minimum of 10 data points, same species, needed)					Go to Page 2		
Are data available to calculate ACR? (Y/N)				N	(NOEC<LC50, do not use greater/less than data)					Go to Page 3		
IWC_a		42.16350662	%	Plant flow/plant flow + 1Q10		NOTE: If the IWCa is >33%, specify the						
IWC_c		17.94001132	%	Plant flow/plant flow + 7Q10		NOAEC = 100% test/endpoint for use						
Dilution, acute		2.371719243	100/IWCa									
Dilution, chronic		5.574132492	100/IWCc									
WLA_a		0.711515773	Instream criterion (0.3 TUa) X's Dilution, acute									
WLA_c		5.574132492	Instream criterion (1.0 TUc) X's Dilution, chronic									
$WLA_{a,c}$		7.115157729	ACR X's WLA_a - converts acute WLA to chronic units									
ACR -acute/chronic ratio		10	LC50/NOEC (Default is 10 - if data are available, use tables Page 3)									
CV-Coefficient of variatior		0.6	Default of 0.6 - if data are available, use tables Page 2)									
Constants	eA	0.4109447	Default = 0.41									
	eB	0.6010373	Default = 0.60									
	eC	2.4334175	Default = 2.43									
	eD	2.4334175	Default = 2.43 (1 samp)		No. of sample	1	**The Maximum Daily Limit is calculated from the lowest					
							LTA, X's eC. The LTAa,c and MDL using it are driven by the ACR.					
$LTA_{a,c}$		2.923936358	WLAa,c X's eA									
LTA_c		3.350261543	WLAc X's eB							Rounded NOEC's		%
MDL** with $LTA_{a,c}$		7.115157903	TU_c	NOEC =	14.054502	(Protects from acute/chronic toxicity)				NOEC =	15	%
MDL** with LTA_c		8.152585068	TU_c	NOEC =	12.266048	(Protects from chronic toxicity)				NOEC =	13	%
AML with lowest LTA		7.115157903	TU_c	NOEC =	14.054502	Lowest LTA X's eD				NOEC =	15	
IF ONLY ACUTE ENDPOINT/LIMIT IS NEEDED, CONVERT MDL FROM TU_c to TU_a												
										Rounded LC50's		%
MDL with $LTA_{a,c}$		0.71151579	TU_a	LC50 =	140.545019	%	Use NOAEC=100%			LC50 =	NA	%
MDL with LTA_c		0.815258507	TU_a	LC50 =	122.660460	%	Use NOAEC=100%			LC50 =	NA	

Page 2 - Follow the directions to develop a site specific CV (coefficient of variation)

B	C	D	F	G	H	I	J	K
IF YOU HAVE AT LEAST 10 DATA POINTS THAT				Vertebrate			Invertebrate	
ARE QUANTIFIABLE (NOT "<" OR ">")				IC_{25} Data			IC_{25} Data	
FOR A SPECIES, ENTER THE DATA IN EITHER				or			or	
COLUMN "G" (VERTEBRATE) OR COLUMN				LC_{50} Data	LN of data		LC_{50} Data	LN of data
"J" (INVERTEBRATE). THE 'CV' WILL BE				***********			************	
PICKED UP FOR THE CALCULATIONS			1	0		1	0	
BELOW. THE DEFAULT VALUES FOR eA,			2			2		
eB, AND eC WILL CHANGE IF THE 'CV' IS			3			3		
ANYTHING OTHER THAN 0.6.			4			4		
			5			5		
			6			6		
			7			7		
Coefficient of Variation for effluent tests			8			8		
			9			9		
CV =	0.6	(Default 0.6)	10			10		
			11			11		
δ^2 =	0.3074847		12			12		
δ =	0.554513029		13			13		
			14			14		
Using the log variance to develop eA			15			15		
	(P. 100, step 2a of TSD)		16			16		
Z = 1.881 (97% probability stat from table			17			17		
A =	-0.88929666		18			18		
eA =	0.410944686		19			19		
			20			20		
Using the log variance to develop eB								
	(P. 100, step 2b of TSD)		St Dev	NEED DATA	NEED DATA	St Dev	NEED DAT/	NEED DATA
δ_4^2 =	0.086177696		Mean	0	0	Mean	0	0
δ_4 =	0.293560379		Variance	0	0.000000	Variance	0	0.000000
B =	-0.50909823		CV	0		CV	0	
eB =	0.601037335							
Using the log variance to develop eC								
	(P. 100, step 4a of TSD)							
δ^2 =	0.3074847							
δ =	0.554513029							
C =	0.889296658							
eC =	2.433417525							
Using the log variance to develop eD								
	(P. 100, step 4b of TSD)							
n =	1	This number will most likely stay as "1", for 1 sample/month.						
δ_n^2 =	0.3074847							
δ_n =	0.554513029							
D =	0.889296658							
eD =	2.433417525							

Page 3 - Follow directions to develop a site specific ACR (Acute to Chronic Ratio)

To determine Acute/Chronic Ratio (ACR), insert usable data below. Usable data is defined as valid paired test results, acute and chronic, tested at the same temperature, same species. The chronic NOEC must be less than the acute LC_{50}, since the ACR divides the LC_{50} by the NOEC. LC_{50}'s >100% should not be used.

Table 1. ACR using Vertebrate data

Set #	LC_{50}	NOEC	Test ACR	Logarithm	Geomean	Antilog	ACR to Use
1	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
2	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
3	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
4	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
5	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
6	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
7	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
8	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
9	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
10	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
				ACR for vertebrate data:			0

Table 1. Result:	Vertebrate ACR	0
Table 2. Result:	Invertebrate ACR	0
	Lowest ACR	Default to 10

Table 2. ACR using Invertebrate data

Set #	LC_{50}	NOEC	Test ACR	Logarithm	Geomean	Antilog	ACR to Use
1	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
2	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
3	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
4	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
5	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
6	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
7	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
8	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
9	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
10	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	NO DATA
				ACR for vertebrate data:			0

Convert LC_{50}'s and NOEC's to Chronic TU's for use in WLA.EXE

Table 3. ACR used: 10

	Enter LC_{50}	TUc	Enter NOEC	TUc
1		NO DATA		NO DATA
2		NO DATA		NO DATA
3		NO DATA		NO DATA
4		NO DATA		NO DATA
5		NO DATA		NO DATA
6		NO DATA		NO DATA
7		NO DATA		NO DATA
8		NO DATA		NO DATA
9		NO DATA		NO DATA
10		NO DATA		NO DATA
11		NO DATA		NO DATA
12		NO DATA		NO DATA
13		NO DATA		NO DATA
14		NO DATA		NO DATA
15		NO DATA		NO DATA
16		NO DATA		NO DATA
17		NO DATA		NO DATA
18		NO DATA		NO DATA
19		NO DATA		NO DATA
20		NO DATA		NO DATA

If WLA.EXE determines that an acute limit is needed, you need to convert the TUc answer you get to TUa and then an LC50, enter it here:

enter it here:	NO DATA	$\%LC_{50}$
	NO DATA	TUa

DILUTION SERIES TO RECOMMEND

Table 4.

	Monitoring % Effluent	Monitoring TUc	Limit % Effluent	Limit TUc
Dilution series based on data mean	34.2	2.9239362		
Dilution series to use for limit			15	6.6666667
Dilution factor to recommend:	0.5848117		0.3872983	
Dilution series to recommend:	100.0	1.00	100.0	1.00
	58.5	1.71	38.7	2.58
	34.2	2.92	15.0	6.67
	20.0	5.00	5.8	17.21
	11.70	8.55	2.3	44.44
Extra dilutions if needed	6.84	14.62	0.9	114.76
	4.00	25.00	0.3	296.30

Cell: I9
Comment:
This is assuming that the data are Type 2 data (none of the data in the data set are censored - "<" or ">").

Cell: K18
Comment: This is assuming that the data are Type 2 data (none of the data in the data set are censored - "<" or ">").

Cell: J22
Comment: Remember to change the "N" to "Y" if you have ratios entered, otherwise, they won't be used in the calculations.

Cell: C40
Comment:
If you have entered data to calculate an ACR on page 3, and this is still defaulted to "10", make sure you have selected "Y" in cell E21

Cell: C41
Comment: If you have entered data to calculate an effluent specific CV on page 2, and this is still defaulted to "0.6", make sure you have selected "Y" in cell E20

Cell: L48
Comment:
See Row 151 for the appropriate dilution series to use for these NOEC's

Cell: G62
Comment:
Vertebrates are:
Pimephales promelas
Oncorhynchus mykiss
Cyprinodon variegatus

Cell: J62
Comment:
Invertebrates are:
Ceriodaphnia dubia
Mysidopsis bahia

Cell: C117
Comment: Vertebrates are:

Pimephales promelas
Cyprinodon variegatus

Cell: M119
Comment: The ACR has been picked up from cell C34 on Page 1. If you have paired data to calculate an ACR, enter it in the tables to the left, and make sure you have a "Y" in cell E21 on Page 1. Otherwise, the default of 10 will be used to convert your acute data.

Cell: M121
Comment: If you are only concerned with acute data, you can enter it in the NOEC column for conversion and the number calculated will be equivalent to the TUa. The calculation is the same: 100/NOEC = TUc or 100/LC50 = TUa.

Cell: C138
Comment: Invertebrates are:

Ceriodaphnia dubia
Mysidopsis bahia

Attachment 9

Revision of Control Equation

- Refer to page 2, item #3 of July 12, 1978 (copy attached).
  NOD concentration for 6.0 mg/l TKN equals $6 \times 4.5 \times 0.25 = 6.75$ (instead of 15.75).

  Therefore, $LW_u = 1.5625\ LW_5 + 6.75$ (ref. eqn(1), p2)

  substituting and solving as before,

  $$LW_5 = 3.4 \frac{Q_s}{Q_w} + 0.3 \quad \text{(ref. eqn (3), p 3)}$$

  For simplicity, omit 0.3 which makes insignificant contribution.

  Therefore, new control equation is

  $$LW_5 = 3.4 \frac{Q_s}{Q_w}$$

- The control equation must now be adjusted to reflect the Doswell water treatment plant and BIPCo raw water intakes on the North Anna above the discharge point. The intake capacities are 3.0 MGD for Doswell and 4.0 MGD for BIPCO. (See attached letter dated May 6, 1985 from Mr. John Jackson, County Administrator.)

  $7 \text{ MGD} \times 1.55 = 10.85$ cfs

  Therefore, control equation becomes

  $$LW_5 = 3.4 \frac{Q_s - 10.85}{Q_w}$$

- using new control equation, the 7 day/10 year allocation is:

Q_W = 5.0 MGD : 1 MGD Doswell ; 4 MGD BIPCO. BIPCO is in the early stages of planning for a mill expansion to double production. Wastewater flow projected at 4 MGD.

$$LW_5 = 3.4 \frac{(43.68 - 10.85)}{5 MGD (1.55)}$$

$$= 14.4 \text{ mg/l}$$

$$14.4 \text{ mg/l} \times 5 \text{ MGD} \times 8.34 = 600 \text{ lbs/day}$$

- The current permit establishes a maximum discharge of 1500 #/d BOD_5 and TSS. This value is based on 1 MGD from Doswell at 30 mg/l and 3 MGD from BIPCO at 50 mg/l. (The 3 MGD represented a doubling of the facility based on the initial design flow of 1.5 MGD.) The attached graph titled "BIPCO Effluent Storage Analysis" was prepared by BIPCO's consultant Mr. John Combs for a meeting on May 2, 1985. At a BIPCO effluent flow of 4 MGD, this graph indicates that the current maximum of 1500 #/d (which corresponds to approx. 100 cfs stream flow) does not allow emptying of the storage basin in a reasonable period of time. The Company has therefore, requested that a new maximum be established based on a stream flow of 300 cfs. As the control equation establishes an allowable discharge given any stream flow, an increase in the maximum limitation is acceptable. Using the control equation, the maximum limitation based on 300 cfs is:

$$LW_5 = 3.41 \frac{(300 - 10.85)}{5(1.55)}$$

$$= 127 \text{ mg/l}$$

$$127 \text{ mg/l} \times 5 \text{ MGD} \times 8.34 = 5296 \text{ \#/d}$$

say <u>5300 #/d</u>

RRJ
5-21-85

MEMORANDUM

State Water Control Board

2111 North Hamilton Street P. O. Box 11143 Richmond, VA. 23230

SUBJECT: Amendment of Doswell NPDES Permit, VA0029521. Supplement to Memorandum dated June 19, 1978

TO: File (42-0525)

FROM: Ray R. Jenkins, Jr. Ray Jenkins

DATE: July 12, 1978

COPIES: L. G. Lawson, J. J. Cibulka, W. D. Jones, Dale F. Jones

On June 28, 1978, Wes Jones, John Combs, and the writer traveled to Philadelphia, Pennsylvania to discuss the proposed Doswell tiered permit with personnel of the EPA's Region III Office. The attached list of people were in attendance.

All aspects of the proposed permit and some of the reasons for proposing a tiered permit were discussed. One of the most significant results of the meeting was the realization that the modeling recalculations detailed in the June 19, 1978, memorandum were not entirely appropriate. Charlie App pointed out that not only did the York River Basin 303(e) plan allocate wasteloads, but it also established a stream modeling methodology that took into accounty NOD(nitrogeneous oxygen demand) and a 20% reserve assimilative capacity (p.53, 67-69 and Appendix F from the plan are attached). In our original work, it had been decided that we would strickly follow the methodology (no NOD or reserve) used in the 1973 Doswell modeling. (It should be noted that the 303(e) Plan indicates that NOD and a 20 % reserve were taken into account in establishing the 200 #d/ $CBOD_5$ allocation. These values however, were derived (back-calculated) from the 200 #/d $CBOD_5$ allocation as this allocation was already in the Doswell NPDES permit when the Plan was prepared.) Charlie App advised that if changes in the allocation and therefore, the 303(e) Plan were to be proposed, the changes should incorporate the modeling methodology outlined in the Plan. These changes essentially involved reassigning rate coefficients to be consistent with other modeling in the Basin Plan, and encorporating the methodology of Appendix F.

The attached memorandum titled "Proposed Discharge to North Anna River, Hanover County" dated June 30, 1978 details the inputs to the modeling as described above. The UCBOD to $CBOD_5$ ratio was 1.25 (ref. Appendix F). The particular modeling effort detailed in the June 30 memorandum was intended to define the 7 day/10 year low flow allocation. It also served as a check on the accuracy of the $CBOD_5$ control equation which was generated by letting L_0 (now UOD of the discharge-river mix) be the input variable to the modeling equation (refer to June 19 memorandum for methodology).

Following the procedure detailed in the June 19, 1978, memorandum, the allowable L_0 using the revised rate coefficients was determined to be 7.2 mg/l. The critical dissolved oxygen deficit of 0.96 mg/l occurred just prior to the confluence of the North and South Anna Rivers. The river was observed to recover with the entry of the South Anna River.

The revised control equation was generated through the following approach, which is in accordance with the Plan methodology. The NOD was subtracted from the discharge concentration in ultimate demand terms. The resultant was converted to 5-day demand and the 20% reserve was subtracted. The resulting expression was rewritten in order that the UOD of the wastewater could be substituted into the mass balance equation of the wastewater-river mix, which was set equal to 7.2 mg/l. The wastewater TKN concentration was calculated to be 14 mg/l using 1.0 MGD of Doswell wastewater at 20 mg/l TKN and 1.5 MGD of BATO wastewater at 10 mg/l TKN. This wastewater mix can be considered to be a worst case condition in that any increase in BATO flow above 1.5 MGD would lower the TKN concentration of the combined discharge. Assuming such a "worst case" TKN concentration was considered preferable to adding another variable (TKN) to the control equation.

The following computations delineate the derivation of the revised control equation:

1. Ultimate oxygen demand (UOD) = ultimate CBOD + nitrogenous oxygen demand (NOD).

2. UOD #/d = $LW_u \times Q_w \times 8.34$, where LW_u = ultimate oxygen demand of waste; and Q_w = wastewater flow rate (MGD)

3. NOD = $15.75 \times Q_w \times 8.34$

$$15.75 = 0.25^* \times 4.5 \times \frac{20\,(1) + 10\,(1.5)}{1 + 1.5}$$

* see p. 53 from York 303 (e), attached

4. UCBOD x 0.8 = $CBOD_5$ ($UCBOD/CBOD_5$ = 1.25)

5. 20% reserve = $CBOD_5$ x 0.8

Therefore BOD_5 discharge in #/d =

$$0.8 \times 0.8 \times \left[(LW_u \times Q_w \times 8.34) - (15.75 \times Q_w \times 8.34)\right]$$

BOD_5 (#/d) $\div$ ($8.34 \times Q_w$) = discharge $CBOD_5$ concentration = LW_5

Therefore,

$$LW_5 = \frac{0.8 \times 0.8 \times \left[(LW_u \times Q_w \times 8.34) - (15.75 \times Q_w \times 8.34)\right]}{8.34 \times Q_w}$$

solving for LW_u:

$$LW_u = 1.5625\, LW_5 + 15.75 \qquad \text{Equation (1)}$$

Remembering now that L_o must equal 7.2 mg/l, the following mass balance equation can be written:

$$\frac{(LW_u \times Q_w) + (1.875^{**} \times Q_s)}{Q_w + Q_s} = 7.2 \qquad \text{Equation (2)}$$

** stream background UCBOD

Substituting equation (1) into (2) yields,

$$\frac{\left[(1.5625\ LW_5 + 15.75) \times Q_w\right] + (1.875 \times Q_s)}{Q_w + Q_s} = 7.2$$

Solving for LW_5 and simplifying,

$$LW_5 = 3.4\ \frac{Q_s}{Q_w} - 5.5. \qquad \text{Equation (3)}$$

This expression will be the permit controlling equation for allowable $CBOD_5$ discharge based upon the water quality standards. (This expression replaces equation (1) in the June 19 memorandum.)

At a 7 day/10 year low flow of 43.68 cfs (North Anna and Little Rivers) and a wastewater flow of 2.5 MGD, the allowable $CBOD_5$ discharge from equation (3) is 684 #/d. This compares well with the value computed from the 7 day/10 year modeling detailed in the June 30, 1978, memorandum, which is as follows:

1407	#/d	UOD
- 330	#/d	NOD ***
1077	#/d	UCBOD
÷1.25		ratio of UCBOD to $CBOD_5$
861.6		
-20%		reserve
690	#/d	allowable $CBOD_5$ discharge

*** Doswell: 20 mg/l TKN x .25 x 4.5 x 1.0 x 8.34 = 188 #/d
BATO : 10 mg/l TKN x .25 x 4.5 x 1.5 x 8.34 = 140 #/d
328 #/d

The 6 #/d difference is the result of not including Q_w in the wastewater-river mass balance when establishing the 7.2 mg/l mix concentration.

Another item discussed with the EPA personnel was the location of stream flow measurement. The State Water Control Board (previously the USGS) maintains a gaging station on the North Anna River at the Route 1 bridge (approximately 8 miles above the discharge point.) At the suggestion of EPA, it was agreed that this gage would provide the most reliable stream measurement. It should be noted that by measuring stream flow at this point, some additional conservatism is added to the control equation (i.e.; use of this measurement excludes a segment flow of 0.45 cfs between the gage and the discharge point, and the Little River at 1.77 cfs, both flows being 7 day/10 year low flows; the conservatism is a result of the fact that these flows were included in the derivation of Equation (3)).

One final item discussed with the EPA was statement number 4 on page 5 of the June 19, 1978, memorandum. There is some difference of opinion concerning the direction of change of K_2 once the model enters the Pamunkey River. In any event, the present modeling used a K_2 computed in accordance with Appendix F.

In accordance with the revised low flow allocation generated in accordance with the 303(e) Plan methodology as described above, it is proposed to modify the York River Basin 303(e) Plan to show a 7 day/10 year low flow allocation of 690 #/d BOD_5. This figure accounts for a 20% reserve assimilative capacity and an NOD of 330 #/d. The ultimate oxygen demand would be 1407 #/d.
ntp

Attendees - 6/28/78 Meeting on Hanover Co.

Rich Sergilorin [illegible]	EPA III - Enf 597-8211
Charles App	EPA III - Water Planning 597-8323
Ray Hodgkiss	EPA III - Enforcement 597-2945
Stuart Kerzner	EPA III - Water Planning 597-3847
Michael Zickler	" ENFORCEMENT 597-2726
Paul E Ambrose	EPA III Enforcement 597-2459
Wesley D. Jone	VSWCB 804-897-0056
Ray R. Jenkins, Jr.	Va. SWCB - PRO 804-257-1[illegible]
James L. Combs	Roy F. Weston 804-271-405

#

Stan Laskowski

Recent evidence reported in the literature indicates that nitrogenous BOD demand occurs in all parts of a river system.[1] The ultimate nitrogenous BOD was calculated stoichiometrically, and each segment of the basin was assigned a percentage of ultimate nitrogenous BOD as follows, to reflect the detention time available for the BOD to take effect:

- Headwaters - 25%
- Tidal/Non-Tidal Interface 50%
- Tidal - 100%

Maximum daily loads for any stream segment depend on its flow and on the location and magnitude of point discharges. Lake Anna will change the low-flow conditions in the downstream portion of the North Anna River and in the Pamunkey River. Then the assimilative capacity of the rivers will be much greater because supplemental water discharged from the lake can maintain a higher level of stream flow, and, therefore, the rivers can accommodate higher maximum daily loads. The maximum daily loads for all segments are presented in Table IV-2.

C. Identification and Location of Water Quality Violations

1. Dissolved Oxygen (DO) Problems

Water quality violations were identified by applying BPCTCA (1977) levels of treatment (obtained from EPA effluent guidelines) and the Virginia water quality standards (Appendix D) to point source discharges. The Virginia standard for DO is a minimum of 5.0 mg/L, and State policy on non-degradation limits the DO decrease to 0.2 mg/L. Water quality conditions were modeled to determine assimilative capacities of major streams in the York System. A summary of assumptions made for this modeling effort is presented in Appendix F. The results of the selected alternatives are depicted in Figures IV-3 through IV-7.

a. South Anna River

Figure IV-3 presents the dissolved oxygen profile for the South Anna River under 1977 loading conditions. The treatment plants in the headwaters (Gordonsville and Louisa-Mineral) are required to provide 92 and 93 percent carbonaceous BOD removal. The high degree of removal is necessitated by the relatively low stream flow and the correspondingly low assimilative capacity of the headwaters.

---

[1] "Zones of Nitrification", T. J. Tuffely, J. V. Hunter and V. A. Matulewic, AWRA, Volume 10, No. 3, June 1974

All fecal coliform contamination in the lower York River Basin cannot be attributed to traditional sources. Chesapeake Corporation may be discharging organisms that have been identified as fecal coliform. It is possible that this may be due to organism misidentification, and Chesapeake Corporation has contracted with VIMS to determine this possibility. The results of this study could have significant impact on condemned shellfish areas.

Although no loading reduction has been established for Contrary Creek, an abatement program is being implemented to reduce the Creek's acid mine drainage. This program includes the following:

- Restore and regrade surrounding areas to minimize erosion and remove tailing piles.
- Mix soil with limestone, appropriate fertilizer, and digested sludge.
- Seed the entire area to establish a vegetative cover.
- Dredge Contrary Creek.
- Develop a monitoring program, involving:
    - Continuous flow at selected locations.
    - Grab samples at selected locations (including Lake Anna) for analysis of heavy metals.

The influence of salt marsh discharges is clearly illustrated in the DO profile for the Pamunkey River (Figure IV-6). This water quality segment was modeled under 1977 loading conditions with zero discharge from all point sources. The conclusions were that this segment is water quality limited by natural causes and that the discharges of Chesapeake Corporation and of the proposed Hanover County regional treatment plant will have little effect on water quality in this segment.

G. Allocation of Reduction Responsibilities

No specific loading reductions are required for any segment in the York River Basin.

H. Assignment of Effluent Limitations

During the course of this study, the rivers, streams, and creeks were analyzed to determine waste load assimilative capacities. Recommendations for 1977 waste loads are based on the magnitude of waste load at each significant point source required to maintain high quality water. Twenty percent of that load has been set aside as a reserve wherever possible.

Table IV-5 shows the recommended effluent limitations in terms of BOD_5 and Ultimate BOD. The first column is the waste load allocation for 1977; these waste discharges were used to establish the existing water quality, which was defined as that resulting after the 1977 effluent limitations were applied.

The maximum daily load allocations were determined by calculating the magnitude of the daily load beyond the 1977 baseline load that could be added without decreasing the DO at the sag point more than 0.2 mg/L (the state policy on non-degradation). The recommended allocation is 80% of the maximum (wherever possible), which reserves 20% as a safety factor. Required removal efficiency to meet the maximum daily load by 1995 is also provided.

TABLE IV-5

WASTE LOAD ALLOCATIONS (IN LBS PER DAY)

POINT SOURCE	1977 WASTE LOAD[2]		MAXIMUM DAILY LOAD		RECOMMENDED ALLOCATION			RAW WASTE LOAD AT 1995		REQUIRED % REMOVAL EFFICIENCY 1995	
	$CBOD_5$	UBOD[1]	$CBOD_5$	UBOD	$CBOD_5$	UBOD	PERCENT RESERVE	$CBOD_5$	UBOD	$CBOD_5$	UBOD
Gordonsville	145	398	150	412	150	412	0	1950	2730	92	85
Louisa-Mineral	50	108	55	118	55	118	0	850	1150	93	90
Doswell	52	110	250	417	200	334	20	1080	1444	85(4)	71
Thornburg	63	150	68	162	68	162	0	1240	1690	94	90
Bowling Green	27	64	29	68	29	68	0	680	926	96	93
Ashland	160	303	235	559	188	447	20	2250	3825	92	88
Hanover (Regional STP)	170	437	280	820	280	820	0	5730	7930	96	90
Chesapeake Corp.	6400	8000	6170[5]	7710[5]	6170[5]	7710[5]	N/A	51700	64630	90	90
West Point	105	380	281[3]	1020	225	814	20	1000	1600	85[4]	66
York & James City SD #1	213	641	2630[3]	7843	2100	6270	20	4480	6780	85[4]	72
American Oil	406	1360	73[5]	245	73	245	N/A	4620	6630	96	98
York Regional STP	2280	9230	10000[3]	40900	8010	32700	20	26900	44900	85[4]	67

[1] UBOD is Ultimate Biochemical Oxygen Demand. Its concentration is derived by the following: $BOD_5/0.80 + 4.5\ (TKN) = (UBOD)$
NOTE: The amount of TKN utilized depends on the location in the basin.

[2] Projected for 1977 based on population projections.
[3] Recommended allocation based on BPCTCA effluent guidelines applied to raw waste loads at 2020.
[4] Minimum removal efficiency.
[5] Allocation based on BATEA Guidelines at 2020.
[6] Based on assumed influent characteristics.

APPENDIX F: CALCULATION OF ASSIMILATIVE CAPACITY AND WASTELOAD ALLOCATIONS FOR OXYGEN-DEMANDING MATERIALS IN NON-TIDAL AND TIDAL STREAMS

1. Non-Tidal

In the modeling of all non-tidal streams, a modified Streeter-Phelps oxygen-sag model was used for both carbonaceous and nitrogenous oxygen-demanding materials. The basic equation utilized in the simulation may be written as:

$$D = \frac{E_1 La}{K_2 - K_1} \left(e^{-K_1 t} - e^{-K_2 t}\right) + D_a e^{-K_2 t}$$

where D = oxygen deficit at time t (mg/l)

D_a = oxygen deficit at origin, where t = o (mg/l)

L_a = ultimate oxygen demand in stream at origin (mg/L)

K_1 = log base e deoxygenation coefficient

K_2 = log base e reaeration coefficient

t = time of travel from origin

K_2 values for all streams were calculated using critical low-flow stream depths and velocities, and K_1 was chosen to conform to a typical sanitary waste and to provide the most reasonable fit to existing stream dissolved oxygen data. It must be emphasized that, in all cases, existing stream data were minimal with respect to water quality, and the modeling parameters used must be regarded as best available estimates which may be considered adequate only for purposes of interim planning. Further explanation of the model components is presented in the following paragraphs.

a. Ultimate Biochemical (Carbonaceous) Oxygen Demand (UBCOD)

The amount of ultimate CBOD discharge is calculated by multiplying reported BOD_5 loadings by 1.25 or by the following equation:

$$\text{UCBOD (lbs/day)} = \frac{\text{Effluent } BOD_5 \text{ concentrations (mg/l)} \times \text{flow(mgd)} \times 8.34}{0.8}$$

b. Ultimate Nitrogenous Oxygen Demand

Ultimate nitrogenous oxygen demands (UNOD) are calculated stoichiometrically as follows:

UNOD (lbs/day) = effluent TKN concentration (mg/l) x flow (mgd x 4.5 x 8.34)

Wherever the effluent concentration of TKN is not available, 20 mg/L is used as the effluent concentration unless otherwise indicated.

c. Ultimate Oxygen Demand

The ultimate oxygen demand at the point of discharge is equal to the sum of ultimate carbonaceous biochemical oxygen demand and nitrogenous oxygen demand.

d. Non-Point Source Contribution

In general, non-point sources of oxygen demanding material are not adequately defined and must at present be considered as a background dissolved oxygen deficit. In the absence of actual stream water quality data, values between 1.0 and 2.0 mg/L were used.

e. Waste Load Distribution

In the process of evaluating stream assimilative capacity, it is necessary to determine the decay of waste loads from all points of discharge as materials flow downstream. For any given segment this may be expressed as follows:

$$L = L_o \exp(-K_1 t)$$

where L_o = ultimate oxygen demand at the upstream end of the segment

K_1 = coefficient of deoxygenation at the ambient stream temperature

t = average time of travel to the point of application in the segment at the 7-day, 10-year average low-flow conditions

f. Critical Low Flow

The 7-day average low flow with a 10-year return period was used for analysis. Annual low-flow series for Virginia were obtained form USGS gaging station records. For segments lacking a gaging station, the critical flow was obtained based on known drainage basin areas and geologic considerations.

g. Velocity and Depth

Stream hydraulic characteristics were estimated from maps and field data, since stream sampling and geometry data were not available.

h. Temperature

In this study, the temperature used in modeling the non-tidal stream segments is 25°C. Statistical analysis showed 25° to be the critical temperature.

i. DO Saturation

Dissolved oxygen concentrations at saturation used in these computations are taken from the table of saturation values found in "Standard Methods for the Examination of Water and Wastewater", 13th edition.

j. Deoxygenation and Reaeration Rate

The deoxygenation rate, K_1 is estimated by the discharged waste characteristics. Further refinement in K_1 is not justified on the basis of existing data. The above rate is considered to be an appropriate average for both carbonaceous and nitrogenous materials within the context of this study.

The reaeration rate K_2 is estimated from the O'Connor-Dobbins formula. It is based on estimated hydraulic depths and velocities. Generally, K_2 values have a higher level of confidence than K_1 values in this study.

Both K_1 and K_2 are corrected for ambient stream temperatures according to the relationships:

$$K_1 = K_{1_{20^\circ}} (1.047)^{T-20}$$

and $$K_2 = K_{2_{20^\circ}} (1.024)^{T-20}$$

where K_1, K_2 = corrected rate constants (day $^{-1}$)

$K_{1_{20^\circ}}$, $K_{2_{20^\circ}}$ = estimated rate constants at $T = 20^\circ C$ (day $^{-1}$)

T = Ambient Stream Temperature ($^\circ C$)

k. Stream Assimilative Capacity

A discussion of stream assimilative capacity is given in Chapter IV. Calculation of the assimilative capacity of each reach is based on the definition of the maximum upstream loading required to allow the stream to meet the specified dissolved oxygen criteria at each critical point (minimum points on the dissolved oxygen versus river mile curve). Since downstream conditions depend on the distribution and magnitude of all upstream discharge points, the calculated assimilative capacity (CAC) was first calculated for the upstream reaches and proceeded downstream. The magnitude and location of all point sources were accounted for in these calculations.

l. Waste Load Allocations

Using the calculated assimilative capacity (CAC), the recommended waste load allocation was calculated according to the expression:

$$\text{Waste load allocation (BOD)} = 0.8 \text{ (CAC)}$$

If the projected 1977 BOD_5 load to the segment is less than the target load, allocation is required. Allocations are normally made in terms of BOD_5. However, an option for negotiation between the discharger and regulatory agencies for increasing BOD_5 discharge allocation in return for reducing ultimate biochemical oxygen demand may be considered.

2. Tidal Model

The dissolved oxygen in the tidal estuaries of the York River Basin was simulated with the use of a one-dimensional, non-steady state model developed by VIMS. This model is based on the finite element method of volume integration. It has been developed for the Virginia State Water Control Board for the specific purpose of serving as a planning and management tool in the analysis of river systems.

The model covers the physical area of the tidal portions of the Pamunkey and the Mattaponi, as well as the York estuary itself. The input data necessary for the tidal model is extensive. The main program requires the total drainage area, tidal cycles, time increments, weighting factor for avection of sea salt, Manning's roughness factor for each section, etc. In addition, sub-routines require extensive data. Fortunately, through cooperation with VIMS staff, the input requirements for this study were reduced to changes in the loadings typified by various alternatives.

One limitation of the VIMS model is its average DO predictions in the area below the Yorktown Bridge. In this area, the assumption of one-dimensionality is invalid. Significant density stratification, as well as vertical and horizontal variations, mandate a three-dimensional model. Such an effort is presently underway at VIMS. However, for the present study, the resulting dissolved oxygen values obtained in this area from the VIMS model were used to determine relative impacts. The absolute levels of dissolved oxygen in this area were obtained from a model recently completed as part of a 201 Facilities Plan for the Hampton Roads Sanitation Commission. Both models predicted little impact on water quality from point source discharges in the area below the Yorktown bridge.

MEMORANDUM

State Water Control Board

2111 North Hamilton Street P. O. Box 11143 Richmond, VA. 23230

SUBJECT: Proposed Discharge to North Anna River, Hanover County

TO: W. D. Jones

FROM: K. C. Das KCDas

DATE: June 30, 1978

COPIES: D. F. Jones, J. J. Cibulka, D. B. Richwine, J. K. Bailey, R. R. Jenkins, C. T. Bathala

In accordance with your suggestion, I am summarizing here below the results of the analysis relative to the proposed discharge into North Anna River. The methodology used herein is in keeping with the procedures as outlined in the York River Basin 303(e) Plan (Appendix F).

The 7-day, 10-year low flow was computed in the manner indicated below:

> The drainage area at the dam site is 343 sq.miles. (Ref: App. C-York Plan) The drainage area between the dam site and the outfall is 127 sq.miles. This dam will release a minimum drought flow of 40 cfs. The contribution due to an additional 127 sq.miles is 1.9 cfs based on a drought flow rate of 0.015 cfs/sq.mile. The Little River contributes 1.77 cfs at the discharge point which is based on a drainage area of 118 sq. miles. (See attached letter)

The reaeration rate was computed using O'Connor-Dobbins equation (see Appendix F of the 303(e) Plan). Using an average velocity of 0.5 fps and an average depth of 3 ft., a reaeration rate of 1.76 day^{-1} (base e, $20^{o}C$) was obtained. An average depth of 3 ft. was assumed to reflect summer low flow conditions in the North Anna River. We have used the deoxygenation rate of 0.23 day^{-1} (base e, $20^{o}C$). The same K_1 rate was used for discharge into South Anna River by Roy Weston. A temperature of $29^{o}C$ was used for the analysis which reflects the highest temperature recorded at the Rt. 30 Bridge on August 17, 1977 (see attached memo). The DO of the effluent is assumed to be 6.5 mg/l which is in agreement with the present NPDES permit limits. The results are summarized in Table 1.

If you have any questions concerning this matter, please let me know.

sw

Attachments

TABLE 1

Parameters	Proposed Discharge to North Anna River	Source of Information
Stream Characteristics		
Receiving Stream	North Anna River	North Anna River
7/10 Low Flow Upstream of Outfall (cfs)*	43.68	
Stream Velocity (fps)	0.5	**
Background DO (mg/l)	6.82	
Critical Water Temperature (^{o}C)	29	PRO
Background BOD (ultimate) (mg/l)	1.88	**
Reaction Rate Constants		
K_1 Deoxygenation (Base e, 20^{o}C)	0.23	**
K_2 Reaeration (Base e, 20^{o}C)	1.76	**
Allowable Effluent Limits		
Effluent Discharge (mgd)	2.5	
DO_{eff} (mg/l)	6.5	
BOD (ultimate) (mg/l)	67.5	
BOD (ultimate) (lbs/day)	1407.0	

BOD (ultimate) = CBOD (ultimate) + NBOD (ultimate)

* 7-Day, 10-Year Low Flow = 41.91 (North Anna) + 1.77 (Little Creek) = 43.68 cfs

** Information gathered via telephone conversation with Kevin Phillips of Roy Weston by PRO staff. This information was used for Pamunkey and South Anna Rivers.

Robert L. Downing, C.L.S.

William F. Goodfellow, P.E., C.L.S

Associated Engineers

ENGINEERS • SURVEYORS • PLANNERS

Post Office Box 5189 • Ashland, Virginia 23005 • Phone (A/C 703) 798-5773

January 8, 1972

State Water Control Board
P. O. Box 11143
Richmond, Va. 23230

Attn: Mr. C. L. Jones

Dear Mr. Jones;

We are preparing a preliminary proposal submittal for a waste treatment facility to serve the community of Doswell, Va. and the Kings Dominion Amusement Park which is now under construction.

In this regard we would like to request from you the degree of treatment that will be required for this installation.

We are enclosing a data sheet and location map for your use in making your determinations.

The aforementioned amusement park is scheduled to open on April 1, 1975 and will require sewerage services approximately 6 months prior to opening. We would, therefore, appreciate your requirements and recommendations as soon as scheduling will permit.

If additional information is needed or elaboration required on the attached data please contact us at any time.

We appreciate your assistance in this matter.

Sincerely,

William F. Goodfellow

William F. Goodfellow, P. E.
Associated Engineers

1/12/72
C. L.

cc: Mr. Norman Phillips, S.H.D.

WFG/mfh

#1

Associated Engineers • Box 5189 • Ashland, Virginia 23005 • Phone 798 - 5773

DOSWELL WASTE TREATMENT FACILITY

DATA SHEET

A. Plant Location- Lat 37° [illegible] 31", Long 77° 25' 41", on the northwest bank of the confluence of the North Anna and Little Rivers. (See Attached Sketch).

B. Owner of Facility- County of Hanover.

C. [illegible] Design Discharge- 1. Initial Stage - 0.5 MGD
2. Ultimate Stage - 2.0 MGD

D. Receiving Stream- North Anna and Little Rivers (Tributaries to York River)

E. Stream Particulars- 1. Drainage area at discharge point is 589 square miles (118 sq. mi. from Little River and 471 sq. mi. from North Anna River.

2. Vepco's North Anna Dam, located 29.7 miles upstream, will release a minimum drought flow of 40 CFS. Drainage area between the dam and discharge point is 127 square miles.

3. Jerrell's Truck Stop, located at U. S. Route 30 and I-95, is currently operating a waste treatment facility (sewage lagoon) which will be obviated by the County plant.

F. Other Data- A water treatment facility of equal design capacities will be constructed concurrently with the waste treatment plant and will be located approximately 1200 feet upstream.

COMMONWEALTH OF VIRGINIA
WILLIAM F. GOODFELLOW
CERTIFICATE No.
5025
CERTIFIED PROFESSIONAL ENGINEER

William F. Goodfellow

MEMORANDUM

State Water Control Board

2111 North Hamilton Street | P. O. Box 11143 | Richmond, VA. 23230

SUBJECT: Choosing Flow and Temperature Values for Modeling the North Anna River for the Doswell STP Discharge

TO: File

FROM: Joyce L. Hoyle Joyce L. Hoyle

DATE: May 23, 1978

COPIES:

The seven-day, ten-year low flow recorded at the gage on the North Anna River is 6.5 cfs (0.015 cfs/sq.mile), but this is augmented by 40 cfs from the dam. This makes the total flow above the discharge 46.5 cfs.*

The closest USGS water quality gage is on the Pamunkey River near Hanover. The monthly average temperatures for the months of May through September are shown below for the period of record.

AVERAGE MONTHLY TEMPERATURE (^{o}C)

Station: Pamunkey River near Hanover (01673000)**

Year	May	June	July	August	September
1975	19.5	25.0	25.5	25.5	22.5
1974	19.5	22.5	-	25.5	21.0
1973	19.5	23.0	25.5	27.0	24.5
1972	18.0	21.5	24.0	23.5	21.0
1971	17.5	22.5	25.5	25.0	21.0
1970	21.3	23.3	26.2	26.3	23.7
1969	19.0	23.0	25.0	24.0	-
1968	16.0	22.0	-	25.0	19.0

(-) Incomplete Data.

** Source: Water Resources Data for Virginia (1968-1975).

* See Page 56 of the York River Basin Plan.

A glance at the table above will show that 27°C was the highest monthly average temperature. The highest instantaneous temperature recorded was 28°C.

There are six ambient monitoring stations on the North Anna River in Hanover County. Ambient monitoring only records instantaneous temperatures. The highest temperature recorded at any of these stations is 29°C at the Route 30 bridge on August 17, 1977. Since the temperature of 29°C was actually recorded in the North Anna River under conditions of fairly low flow, I suggest using 29°C for modeling.

sw

KB
RRJ

MEMORANDUM

State Water Control Board

2111 North Hamilton Street | P. O. Box 11143 | Richmond, VA. 23230

SUBJECT: Amendment of Doswell NPDES Permit VA0029521

TO: File (42-0525)

FROM: S. S. Waldo and R. R. Jenkins SSW Ray Jenkins

DATE: June 19, 1978

COPIES: L. G. Lawson, J. J. Cibulka, W. D. Jones, Dale F. Jones, 60-0033

By letter dated April 7, 1978, John E. Longmire, Hanover County Administrator, transmitted a permit amendment request for the Doswell Wastewater Treatment Plant. The permit amendment request reflected the discharge of treated wastewater from the proposed Bato plant. The amendment request was updated by a letter dated April 28, 1978 and completed by correspondence with transmittal dates of May 8, 1978 and May 26, 1978. Mr. Longmire requested that the Board consider a tiered permit to take into account increased assimilative capacity in the stream during the periods of high flow in the North Anna River (other permits incorporating this concept have been written in the State, although this is the first permit that incorporates an "instantaneous" correlation between river flow and discharge).

The staff has investigated the feasibility of a tiered permit concept for the Doswell permit. In that an allocation for Doswell is already included in an adopted 303(e) plan (York River Basin), the original intent of the investigation was to preserve all parameters used in the adopted allocation modeling. By retaining the original inputs, the generation of tiered levels of discharge does not constitute remodeling, but only a recalculation using the existing model. Subsequently, it was discovered that an obvious error had been made in the original allocation. The original modeling in 1973 resulted in an allowable discharge of 400 lbs/day at 2 MGD wastewater flow. But when Hanover County decided to build only a 1 MGD treatment plant, this 400 lbs/day was simply halved to obtain an allocation of 200 lbs/day. In addition, it was determined that the river temperature used in the modeling and the 7-day/10-year low flow used were incorrect. It was then decided that the errors would be corrected and appropriate revisions to the 303(e) plan proposed. These revisions were to change the stream temperature (29°C instead of 32.2°C) and to revise the flow (46.5 cfs* instead of 42.4 cfs for the North Anna River at 7-day/10-year low flow). No other changes were made; i.e., rate coefficients selected at 20°C in the original modeling (K_1* = 0.13, K_2* = 0.68), UBOD*/BOD_5* ratio(1.3),

*Terms:
cfs = cubic feet per second
K_1 = deoxygenation rate
K_2 = reaeration rate
UBOD = ultimate biochemical oxygen demand
BOD_5 = 5-day biochemical oxygen demand

etc. remain the same. The resulting calculations were run precisely in accordance with the procedure previously used in the 303(e) allocation, with the exception of the temperature change and flow change mentioned above and discussed more fully below. Thus the basic modeling remains unchanged. All inputs to the modeling equation were those determined for the seven-day/ten-year low flows; the inputs were not adjusted at increased river flows. Fixing these factors keeps the calculations more conservative (i.e., increases the "safety factors")

The original modeling used a stream temperature of 32.2°C. This temperature was taken directly from the Water Quality Standard for a Class III stream(i.e., 90°F = 32.2°C). This methodology of choosing a stream temperature was used only for a short time by the Board and since then the ambient temperature, as measured instream, has been used exclusively. For the North Anna River this temperature was determined to be 29°C, which is the maximum temperature observed.

The original modeling used a critical flow in the North Anna River of 42.4 cfs. An investigation of stream flow for the North Anna River has determined that, in fact, the critical flow is 46.5 cfs. This is based on a guaranteed release from Lake Anna of 40 cfs and a "stretch" flow in the drainage area between the lake and the Doswell gaging station of 6.5 cfs. The use of the corrected values for river temperature and flow more precisely reflect actual conditions in the stream.

In making the calculations a simplification was made by letting the input variable to the modeling equation be the ultimate biochemical oxygen demand (UBOD) of the discharge-river mix (hereafter referred to as L_o). This procedure was preferred to the more typical procedure of inputting various wastewater flow and concentration values.

When the temperature was corrected to 29°C, an additional simplification was made in the modeling. The existing Doswell permit requires a minimum dissolved oxygen (DO) level of 6.5 mg/l. At 32.2°C, the background river DO is also 6.5 mg/l. Therefore, at any wastewater volume-river volume mix, the DO of the mix is 6.5 mg/l. At 29°C, however, the background stream DO is 6.84 mg/l and the effluent DO is still 6.5 mg/l. Effluent volume now influences the DO of the mix and,therefore, influences the results of the modeling calculations. The simplification in the calculations was to input an initial DO of the mix of 6.8 mg/l. This value results from the mass balance of 4.0 MGD (in accordance with Hanover's amendment application for ultimate flows) of wastewater with a DO of 6.5 mg/l and a river flow of 49 cfs with a DO of 6.84, and should represent the lowest initial DO under any conditions (Note: The flow of 49 cfs includes 46.5 cfs from the North Anna River and the 7-day/10-year low flow of 2.5 cfs from the Little River, which enters the North Anna immediately below the discharge.). Since the effluent volume is small in comparison to total flow, this simplification impacts the results only slightly.

As a result of setting all of the foregoing parameters constant at "worst case conditions", the calculations were performed with only one variable - the UBOD of the discharge-stream mix (L_o). It was then observed that by having fixed all other input values, L_o did not change with increased river flow when the same DO value at the "sag" was calculated. Using an L_o so determined, a mass balance equation is used to calculate the allowable discharge concentration for various wastewater and stream flows. The inputs to the calculations included the Little River at a 7-day/10-year low flow of 2.5 cfs and the South Anna River 3.7 miles downstream of the discharge at a 7-day/10-year low flow of 12.1 cfs. The UBOD background of the rivers was 3.0 mg/l (BOD_5 = 3.0/1.3 = 2.3) and all stream velocities were 0.5 fps The calculations indicated that the sag point occurred below the confluence with the South Anna River. The critical dissolved oxygen deficit of 0.96 mg/l (10% of D.O. saturation at 29°C, 0.76 mg/l, plus 0.2 mg/l, anti-degradation application for this case) occurred at an L_o of 5.5 mg/l.

When used as described above, the calculations indicate that the Board's anti-degradation policy will be met as long as a UBOD (L_o) of 5.5 mg/l (UBOD/BOD_5 = 1.3; therefore, BOD_5 = 4.2 mg/l) is maintained in the mix of the stream and wastewater flow. Using this knowledge, an equation was developed which can be used to determine an allowable BOD_5 discharge concentration at various stream flows. This equation was derived from the basic mass balance equation:

$$L_{mix} = \frac{Q_s L_s + Q_w L_w}{Q_s + Q_w}$$

Where:

L_{mix} = BOD_5 of the stream-wastewater mix

Q_s = stream flow

Q_w = wastewater flow

L_s = background BOD_5 in stream

L_w = BOD_5 of wastewater

Using known values and calculating for L_w:

$$4.2 = \frac{Q_s(2.3) + Q_w L_w}{Q_s + Q_w}$$

or, in another form,

$$L_w = \frac{4.2 + 1.9Q_s}{Q_w} \qquad \text{Equation (1)}$$

Use of this equation enables an operator or a regulatory agency to easily enter stream flow and wastewater flow to determine the allowable effluent BOD_5 (L_w) which will maintain the State's water quality standards. At a wastewater flow of 2.5 MGD, which is the proposed start-up flow, and critical low flow of 49 cfs, the low flow allocation was determined to be 584 lbs/day. This low flow allocation will be one of the proposed changes to the 303(e) plan.

There is a requirement which is also controlling for this discharge. 40CFR133 limits domestic waste discharges to a concentration of 30 mg/1 BOD_5 and total suspended solids (TSS). However, 40CFR133.103(b)(Secondary Treatment Definition: Industrial Waste) allows for an increase in the "secondary treatment" limitation of 30 mg/1 for BOD and suspended solids in proportion to the industrial contribution to the total wastewater flow at the industrial wastewater concentration which would apply for an industrial point source discharge by that industry type. Since the Bato wastewater will be treated to levels of 50 mg/1 BOD_5 and total suspended solids (which will be defined by the Board as "new source" discharge limitations for this industry), this concentration is used in the following mass balance equation to define an allowable discharge concentration for BOD_5 and total suspended solids:

$$\text{TSS or } BOD_5\,(\text{mg/1}) = \frac{30Q_H + 50Q_B}{Q_H + Q_B} \qquad \text{Equation (2)}$$

While the BOD_5 limitation is controlled by either Equation (1) or Equation (2), whichever is more stringent, Equation (2) is the only controlling equation for the total suspended solids discharge.

A maximum limitation has also been established for BOD_5 and total suspended solids quantity. This limitation is based on 1 MGD of Doswell wastewater at 30 mg/1 BOD_5 and TSS and 3.0 MGD at Bato wastewater at 50 mg/1. The flow figures are in accordance with Hanover's amendment application. The appropriate quantity calculation gives a maximum allowable quantity discharge of 1500 lbs/day. This limit cannot be exceeded regardless of the value determined by Equations (1) or (2).

Before describing the actual proposed permit amendment, it is important to summarize the conservative factors which were used in the derivations of the above equations. These are listed below:

1. Segment flow (runoff, groundwater and small streams) was not included below the discharge point.

2. Stream velocity and other inputs to the calculation were set at critical low flow and were not changed with increased river flow.

3. A minimum initial mix DO of 6.8 mg/1 was used instead of recalculating the mix at higher stream flows; recalculating would have the effect of slightly increasing the mix DO.

4. The rate of coefficients were not redefined below the confluence of the North and South Anna Rivers (deoxygenation coefficient would actually drop; reaeration coefficient would actually increase).

The investigators point out that these calculations assume a complete mix at the discharge. However, the point should also be made that this assumption is used in every "free flowing" modeling effort and is completely in accordance with prior modeling practices.

Permit Conditions

The proposed permit amendments were drafted in such a way as to maximize the use of Equations (1) and (2) above. This necessitated a unique permit in that BOD_5 and suspended solids limitations are not specifically placed in the permit. Each value must be calculated using Equations (1) or (2).

Because Equation (1) is geared towards an "instantaneous" correlation between river flow and discharge concentration, it was necessary to provide a shorter limitation period than a one month average, which is normal on most other permits. It was resolved that the BOD_5 and total suspended solids limitations will be reported as a weekly average of 7 calendar day values, and also that additional monitoring would be required to have an "instantaneous" correlation between BOD_5 and some other parameter (TOC* or COD*) to enable an operator to determine at any point in time with some degree of surety whether or not he is in compliance with the permit. The limitations included on the composite waste discharge (point source 001) are as follows:

*Terms: TOC = Total organic carbon
COD = Chemical oxygen demand

The BOD_5 limitation is referenced as paragraphs 4(a) through (d) in Part I, paragraph A-1 of the attached proposed amendments. 4(a) is a modification of Equation (1) listed above, which requires a weekly average. 4(b) does the same for Equation (2) above. 4(c) states that the more stringent of (a) and (b) above shall be the effluent BOD_5 concentration, except when flows are at 7-day/10-year low flow or less, at which time the more stringent of the following shall apply:

1. The maximum quantity allowable shall be no greater than 584 lbs (this is the waste load allocation which is proposed to be included in the 303(e) plan).

2. The concentration established by 4(b) above (which is the "secondary treatment" limitation).

4(d) states that the effluent BOD_5 quantity discharge shall not exceed 1500 lbs/day at any time.

Paragraphs 5(a) and (b) are the limitations for total suspended solids and are based on Equation (2) above modified to show a weekly average. 5(b) also limits the maximum quantity discharge at 1500 lbs/day.

Paragraph 6 is included to provide "real time" control over the amount of waste discharged. Because a lag time of 5 days is inherent in the BOD_5 test, it was realized that it was necessary to have some instantaneous determination of effluent quality for the operator to use in determining his allowable discharge. It was determined that this could be done best by a plot of TOC vs. BOD_5, which would be updated using corresponding 24-hour composite samples of TOC and BOD_5 daily. This plot would be composed of data from a rolling 30 consecutive day period so that when a new data point is added, the oldest data point would be removed. Since it is possible that a plot of TOC vs. BOD_5 might not give the best correlation for these particular wastewaters, a special requirement was included in the proposed amendment which requires the permittee to also run COD tests on the same frequency as TOC to determine if COD would be a better correlation. At the end of the first six months of operation, the results will be evaluated to determine which parameter (i.e., TOC or COD) gives the closer correlation.

It is also necessary to place monitoring requirements on the separate waste streams coming into the combined outfall so that waste quality can be determined on each. These monitoring requirements are included as paragraph A-2 for Bato and paragraph A-3 for Hanover. Additionally, it was necessary to place a total chlorine residual limitation on the effluent from Hanover which is included in Paragraph A-3. The Bato waste stream does not include any sanitary waste (it is separately transported to the Doswell plant), thus, no chlorination is required. The permit requires that a plot of TOC vs. BOD_5 will be developed for each of these waste streams so that an operator can determine immediately the approximate quality of either waste stream.

Because of the special nature of the effluent limitations for this plant, it was necessary to develop a new reporting form also. This form is attached to the memorandum. The form includes spaces for entering all parameters which will be necessary to calculate the BOD_5 and total suspended solids limitations and for reporting actual final discharge values of BOD_5, total suspended solids, pH, and dissolved oxygen (and total chlorine residual for the Doswell waste stream). In addition, a report form for the TOC, COD, and BOD_5 data used to develop the correlation plot is also included as an attachment.

Because the BOD_5 and total suspended solids limitations are based on a calendar week average, it was necessary to address this fact in the development of the monitoring report form. Paragraph 7 of Part I, A-1, states that if any month ends in an incomplete calendar week, the report for that week shall be included in the following monthly reporting period. For that reason, the report form has spaces for five weeks on it realizing that during some months there will only be three calendar weeks filled out and in others there will be five. Beyond these special reporting requirements the monitoring report form contains all the information required and included in the standard DMR format currently used in other NPDES permits, including a space for bypass and overflow information and a signature block.

The remainder of the permit shall be made up of standard pages, therefore, no discussion of those conditions is included here.

Any questions concerning the development of this proposed permit should be directed to the writers or Wesley Jones.

/pc
Attachments

Attachment 10

F. LAKE LEVEL CONTINGENCY PLAN

The intent of this condition is to allow specific reductions in the lake discharge flow when the lake water level drops below designated levels due to drought conditions, taking into account and minimizing any adverse effects of any release reduction requirements on downstream users.

1. Except as provided in 2. below, the permittee shall at all times provide a minimum instantaneous release from the Lake Anna impoundment of 40 cfs.

2. When the level in Lake Anna reaches 248 feet above mean sea level (msl), the permittee will begin reducing releases below the 40 cfs minimum in accordance with the following conditions:
   a. Minimum instantaneous releases shall not drop below 20 cfs.
   b. The Water Compliance Manager of DEQ's Piedmont Regional Office and the downstream users identified below will be given at least 72 hours notice by the permittee prior to the initiation of flow reductions:
      - Hanover County Public Utilities
      - Bear Island Paper Company
      - Engel Farms, Inc
      - Pamunkey Indian Tribal Government
   c. Skimmer gate adjustments will be performed in accordance with Station Operating Procedures.
   d. Releases shall be stepped down in increments of approximately 5 cfs with at least a 72-hour period following each incremental reduction and prior to any subsequent reduction.
   e. During the period in which releases are reduced below 40 cfs, conditions in the North Anna River shall be monitored in accordance with the monitoring plan submitted by the permittee and approved by the DEQ prior to implementation of the Lake Level Contingency Plan.
   f. Releases from the dam shall return to 40 cfs upon the Lake level returning to greater than 248 ft. msl. Increases of flow will occur in 5 cfs increments with a 24 hour wait period prior to the next gate adjustment.
   g. If any downstream user identifies an adverse effect at any time during flow reductions and notifies the DEQ of the adverse effect, the Director shall make a timely investigation. If after notice to the permittee and the affected downstream users the Director finds an adverse effect from the flow reductions, the flows shall be increased in 5 cfs increments with a 24 hour wait period prior to the next gate adjustment, until the flow reaches 40 cfs or the Director finds that the adverse effect has been eliminated.
   h. Adverse effect is defined as the inability to withdraw/discharge water for proper operation of facilities, or impairment of water quality.

Attachment 11

WATER QUALITY MODELING
NORTH ANNA AND PAMUNKEY RIVERS
YORK RIVER BASIN, VIRGINIA

Prepared for:

Bear Island Paper Company

Ashland, Virginia

HDR Project Number 317-10-35

Prepared by:

HDR Infrastructure, Inc.
6400 Fairview Road
Charlotte, North Carolina

January 1988

TABLE OF CONTENTS (continued)

ANALYSIS OF BIODEGRADABLE TKN FRACTION

Prepared for

Bear Island Paper Company and Hanover County, Virginia

INTRODUCTION

The Bear Island Paper Company operates a TMP pulp and paper mill in Ashland, Virginia. Wastewater from the mill is treated on site and is discharged into a national pollutant discharge elimination system (NPDES) regulated outfall (NPDES #VA0029521) controlled by Hanover County, Virginia. The NPDES permit was renewed in October 1985, and, as part of that renewal, the effluent standard was modified.

The previous permit had not been regulated for either ammonia or total kjeldahl nitrogen (TKN). An effluent TKN limitation of 6 mg/l was implemented as part of the permit renewal. The TKN limitation was imposed to control oxygen utilization in the receiving stream. The TKN oxygen utilization was based on 4.5 mg of oxygen per mg TKN.

The use of the TKN limit in the final October 1985 NPDES permit was a last minute alteration of the draft (as a draft of the permit had previously been based on ammonia). The assumption made by Hanover County and Bear Island Paper Company (BIPCO) in accepting the TKN limit was that the only TKN in the effluent would be in the form of ammonia nitrogen. The long-term wastewater treatment plant data had indicated that a discharge of less than 6 mg/l ammonia could be achieved. Therefore, the 6 mg/l TKN limit was thought to be an acceptable limitation.

In the final NPDES permit issuance, the State had a provision for the substituton of the ammonia limit for the TKN limit. However, any such substitution would require approval from the State Water Control Board (SWCB) staff.

Subsequent to the implementation of the revised permit, it has been found that the combined effluent consistently exceeds the 6 mg/l TKN limitation. However, the discharge has been in compliance with the 6 mg/l ammonia limitation.

HDR was retained in 1986 to evaluate this situation. A preliminary analysis was conducted which indicated that a significant portion of the TKN in the Bear Island wastewater was non-biodegradable and the use of a theoretical TKN oxygen utilization would not be correct. The program to determine oxygen utilization of the waste was conducted utilizing inhibited and noninhibited BOD analyses. The results of this program are presented in Table 1. This indicated that the TKN in the Bear Island wastewater did not exert the 4.5 mg/l oxygen demand.

Based on the results of the preliminary testing program, the Bear Island Paper Company, in conjunction with Hanover County, entered into a consent agreement with the State of Virginia. A primary objective of that consent agreement was to identify the biodegradable portion of the TKN in the BIPCO effluent.

The results of the biodegradation program are presented in this report.

BIODEGRADATION PROGRAM

The methodologies for conducting the biodegradation program followed the procedures which had been previously submitted to and approved by the SWCB. A copy of the procedure is presented in Appendix A. All samples were

TABLE 1

SUMMARY OF TKN OXYGEN UTILIZATION
BEAR ISLAND EFFLUENT

Sample Date	TKN (mg/l)	NH_3-N (mg/l)	BOD_{20} Inhibited (mg/l)	BOD_{20} Uninhibited (mg/l)	TKN Oxygen Utilization $\frac{mg\ O_2}{mg\ TKN}$	Organic Nitrogen Oxygen Utilization $\frac{mg\ O_2}{mg\ O\text{-}N}$
May 9	10.92	0.17	31	40	0.82	0.75
May 14	6.97	0.21	24	29	0.72	0.58
May 19	12.35	3.30	73	73	0	0
May 22	1.29	0.07	49	51	1.55	1.30

collected by personnel from either BIPCO or Hanover County and all analyses were conducted by Environmental Laboratories, Inc. of Ashland, Virginia.

BIODEGRADATION RESULTS

In order to determine the biodegradable portion of the TKN a series of flask tests were initiated. The first tests were set up with waste samples collected on July 14, 1987, (sulfonation being utilized) and the second set with samples collected on August 26, 1987, (TMP production with purchased Kraft). Tests were performed on both TMP with purchased Kraft and sulfonation wastewaters. Phase I consisted of sulfonation wastes and Phase II was comprised of the TMP with purchased Kraft.

The samples for analysis were prepared by combining the wastewater samples with dilution water and seed in accordance with the test procedure and were maintained in test flasks under an oxygen blanket. Samples from the TKN testing flasks were collected and analyzed every 10 days. A summary of the data from the individual flasks is presented in Appendix B.

The TKN biodegrability data for the tests are presented on Table 2. The results from the tests are plotted and are presented in Figures 1 thru 6. The analysis of the data indicates that the degradable portion on BIPCO wastewater and combined Doswell/BIPCO wastewater is very similar, i.e., 34 to 46% degradable TKN. Therefore, for the purposes of performing the water quality modeling, it is recommended that the analysis be based on 46% degradable and 54% nondegradable TKN.

TABLE 2

TKN BIODEGRADABILITY

Phase	Sample	Initial TKN, mg/l	Final TKN, mg/l	% Degradable TKN	% Non-degradable TKN
I	BIPCO	4.76	3.17	33	67
	Doswell	5.82	1.15	80	20
	Combined	6.16	4.08	34	66
II	BIPCO	11.40	6.16	46	54
	Doswell	1.89	0.22	88	12
	Combined	9.25	5.76	38	62

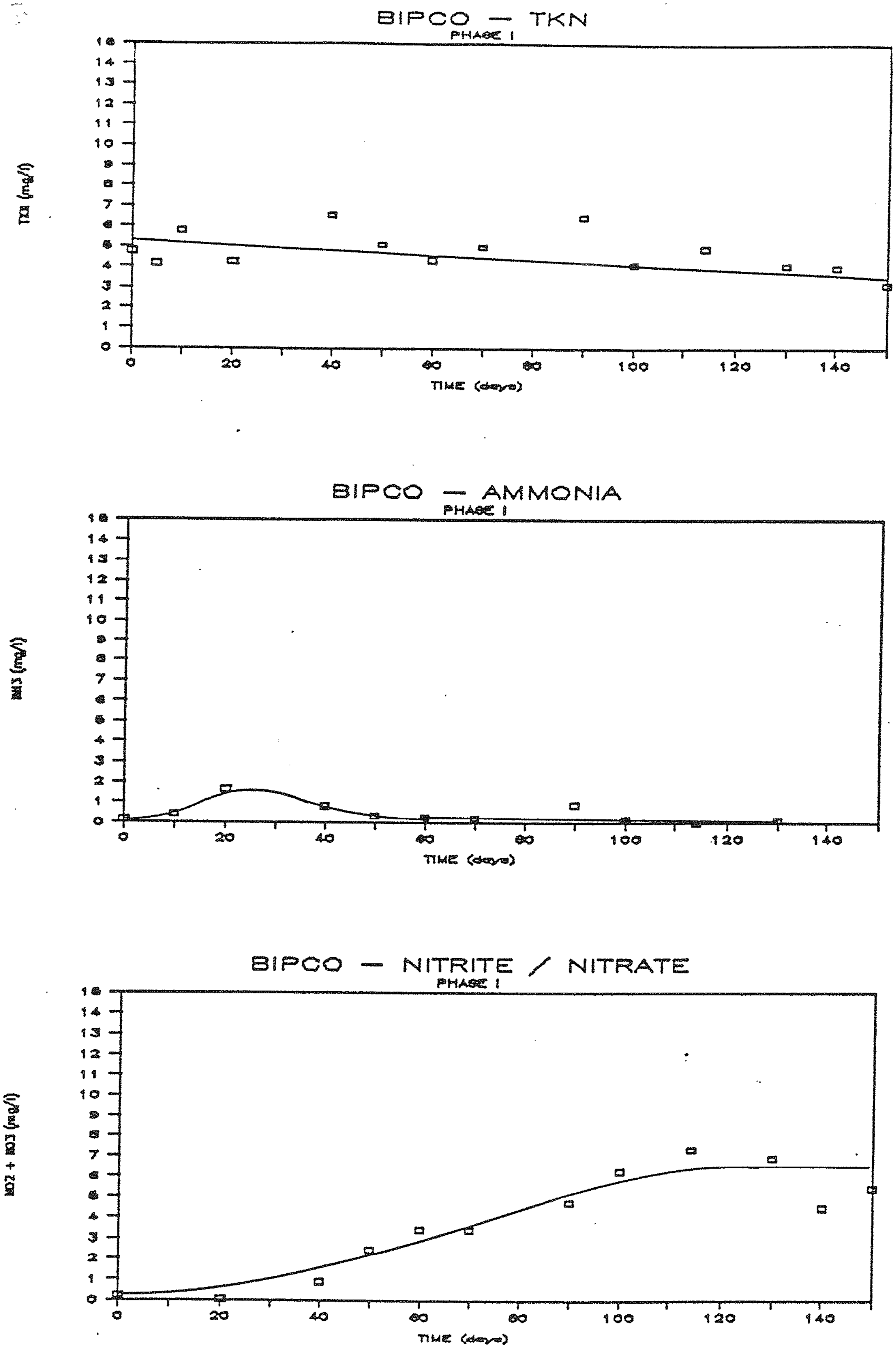


Figure 1: Chronological Variation - Phase I BIPCO

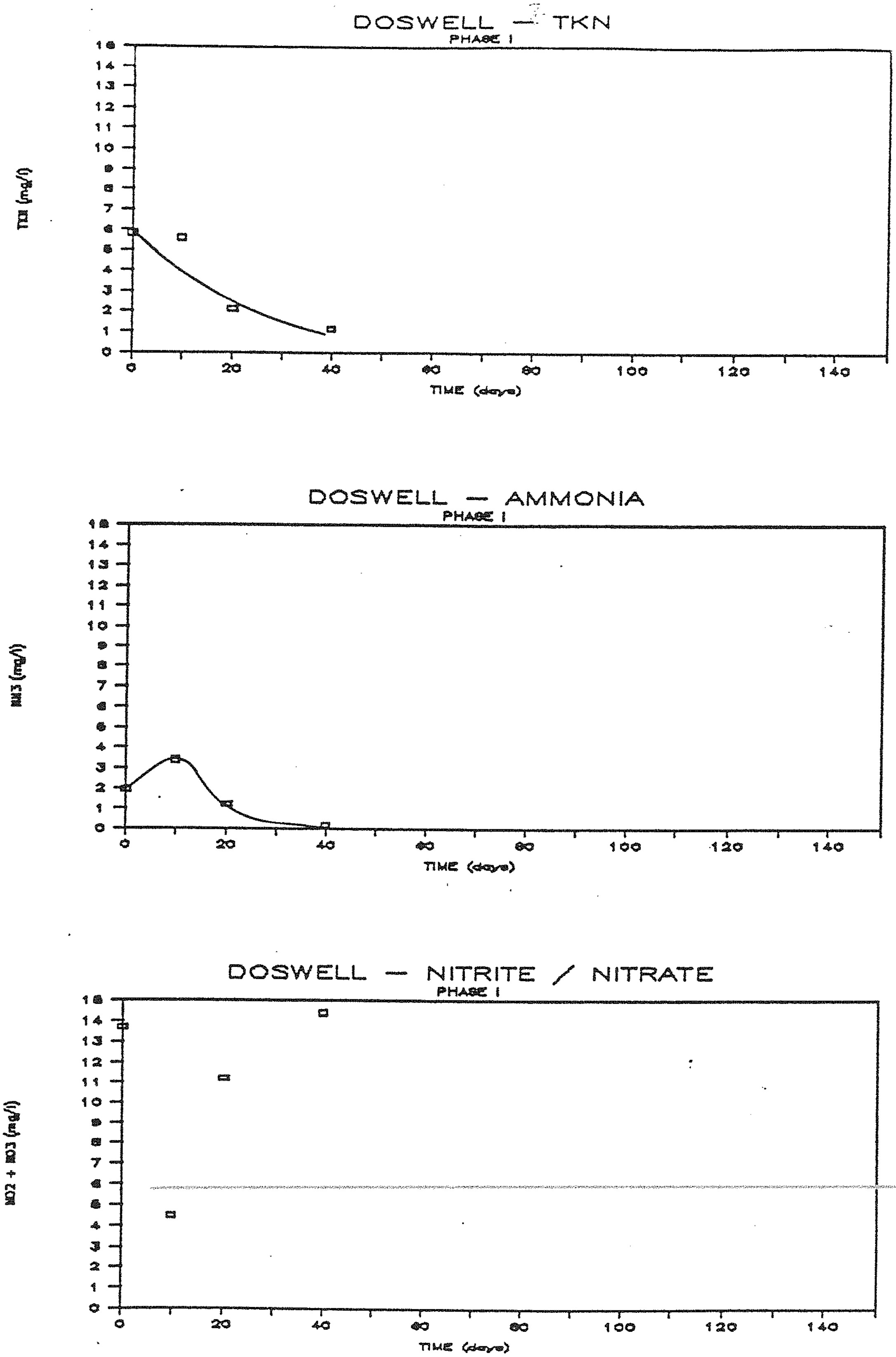


Figure 2: Chronological Variation - Phase I Doswell

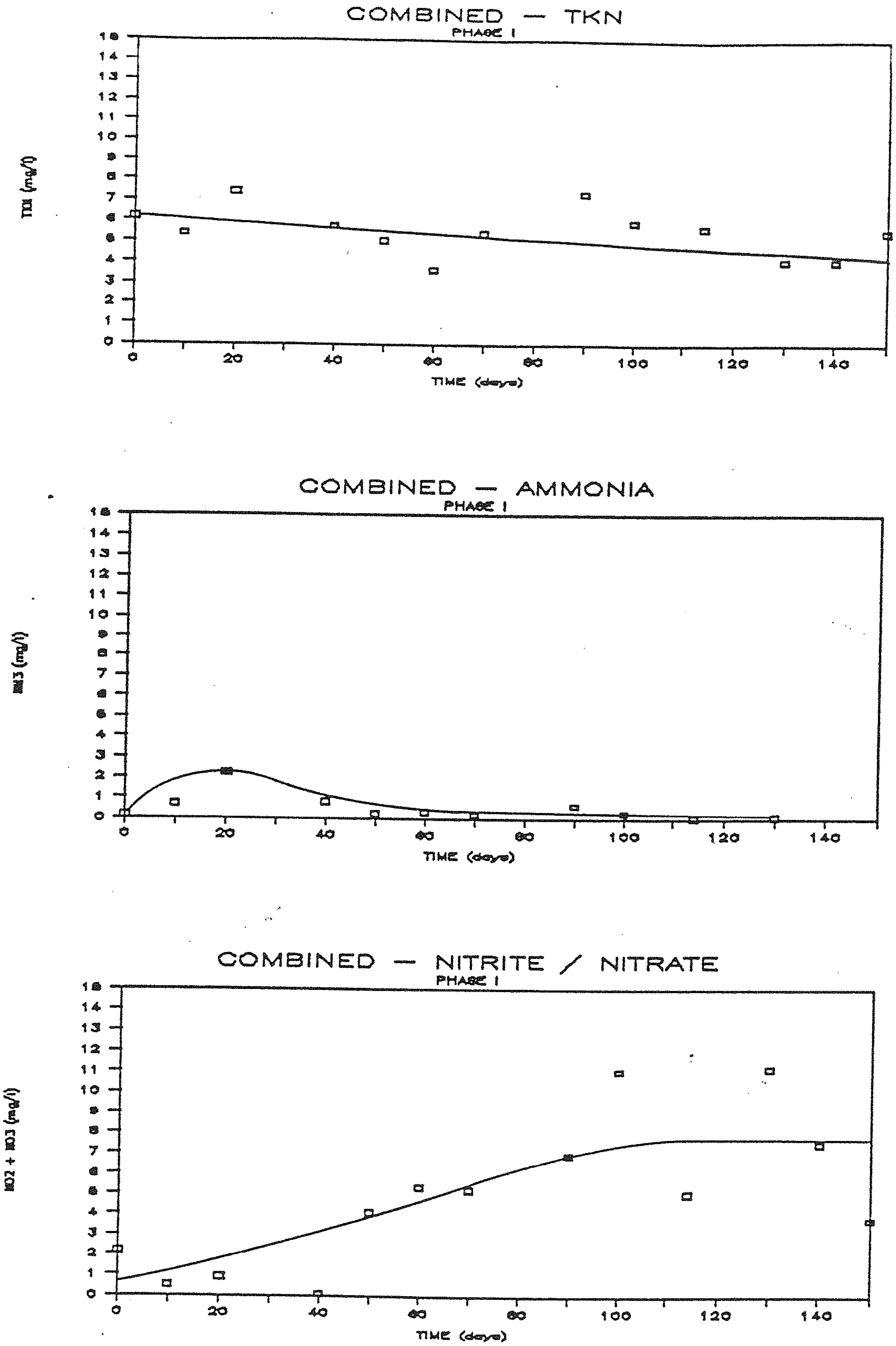


Figure 3: Chronological Variation - Phase I Combined

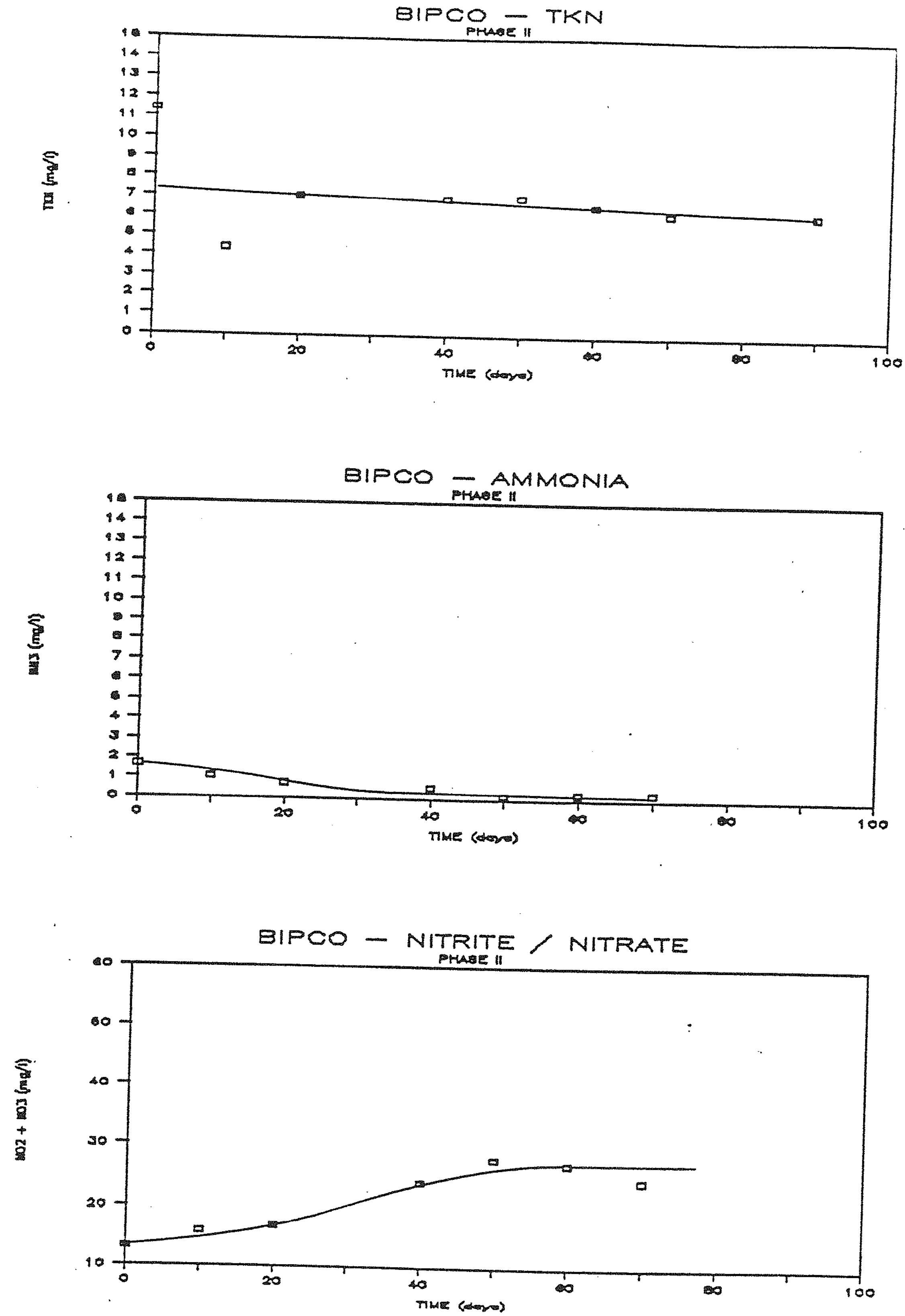


Figure 4: Chronological Variation - Phase II BIPCO

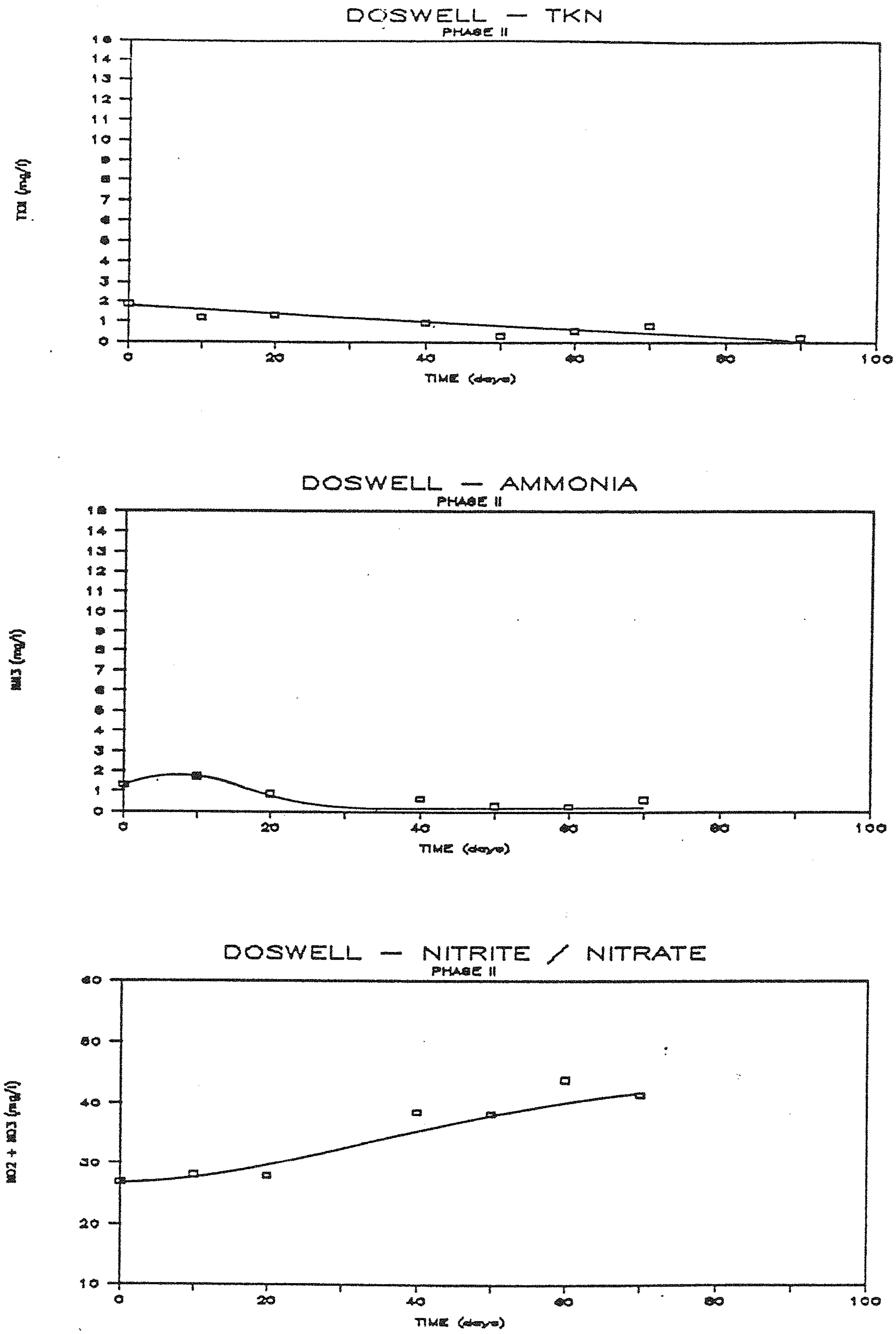


Figure 5: Chronological Variation - Phase II Doswell

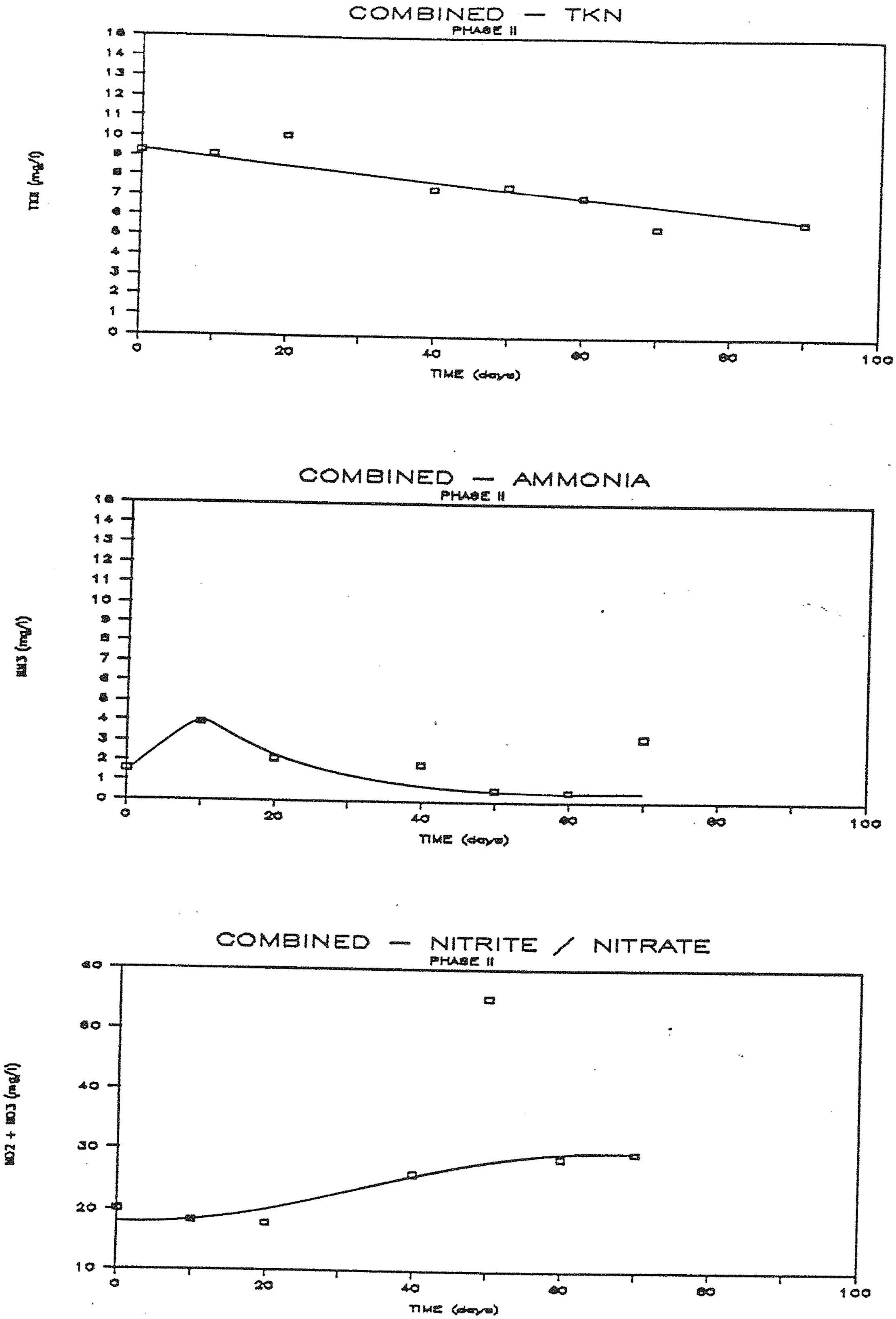


Figure 6: Chronological Variation - Phase II Combined

APPENDIX A

Procedure for Analysis of Non-Biodegradable TKN

PROCEDURE FOR ANALYSIS OF NON-BIODEGRADABLE TKN

I. DILUTION WATER

Dilution water shall be prepared as described below:

Buffer solution prepared according to Standard Methods contains ammonium ion, which would add to the measured nitrogenous BOD. Instead of using that formulation, prepare buffer as follows:

- Add the following reagents to approximately 500 mg of distilled/deionized water and dissolve. Then make up to one liter in a volumetric flask.
- 15.7 g. K_2HPO_4
- 24.1 g. Na_2HPO_4 $7H_2O$
- 11.1 g. KH_2PO_4

This solution should have a pH of 7.2 as prepared.

- Dilution water should be prepared according to Standard Methods, but with substitution of the above buffer.

II. SAMPLE PREPARATION

Prepare sample for analysis consisting of:

A. 1000 ml mill final effluent.

B. 500 ml dilution water.

C. Add commercially available nitrifying seed to culture.

Note: All testing to be performed in duplicate and with a control consisting of glucose-glutamic acid and ammonium chloride.

III. INITIAL ANALYSIS

Analyze mill final effluent for TKN, NO_2/NO_3-N, and NH_3-N.

Analyze dilution water for TKN, NO_2/NO_3-N, and NH_3-N.

Analyze combined sample for pH, TKN, NO_2/NO_3-N, and NH_3-N.

IV. Place sample in 2000 ml flask (as shown in Attachment A), maintain flask at ambient laboratory temperature, maintain under an oxygen blanket for 40 days

V. Prior to aeration, at days 2, 5, 10, 20, 30 and 40, remove 50 ml sample and check pH and dissolved oxygen. The pH will be maintained in the 6.5 to 8.5 range and the dissolved oxygen in excess of 2 mg/l. If, at day 2 or any time low pH and DO levels are found, these will be adjusted and more frequent sampling will be initiated. Do not return sample to flask.

VI. Analyze sample at days 10, 20, 40, and conclusion for TKN, NO_2/NO_3-N, and NH_3-N. The conclusion of the test will be tied into the conclusion of the ultimate BOD test.

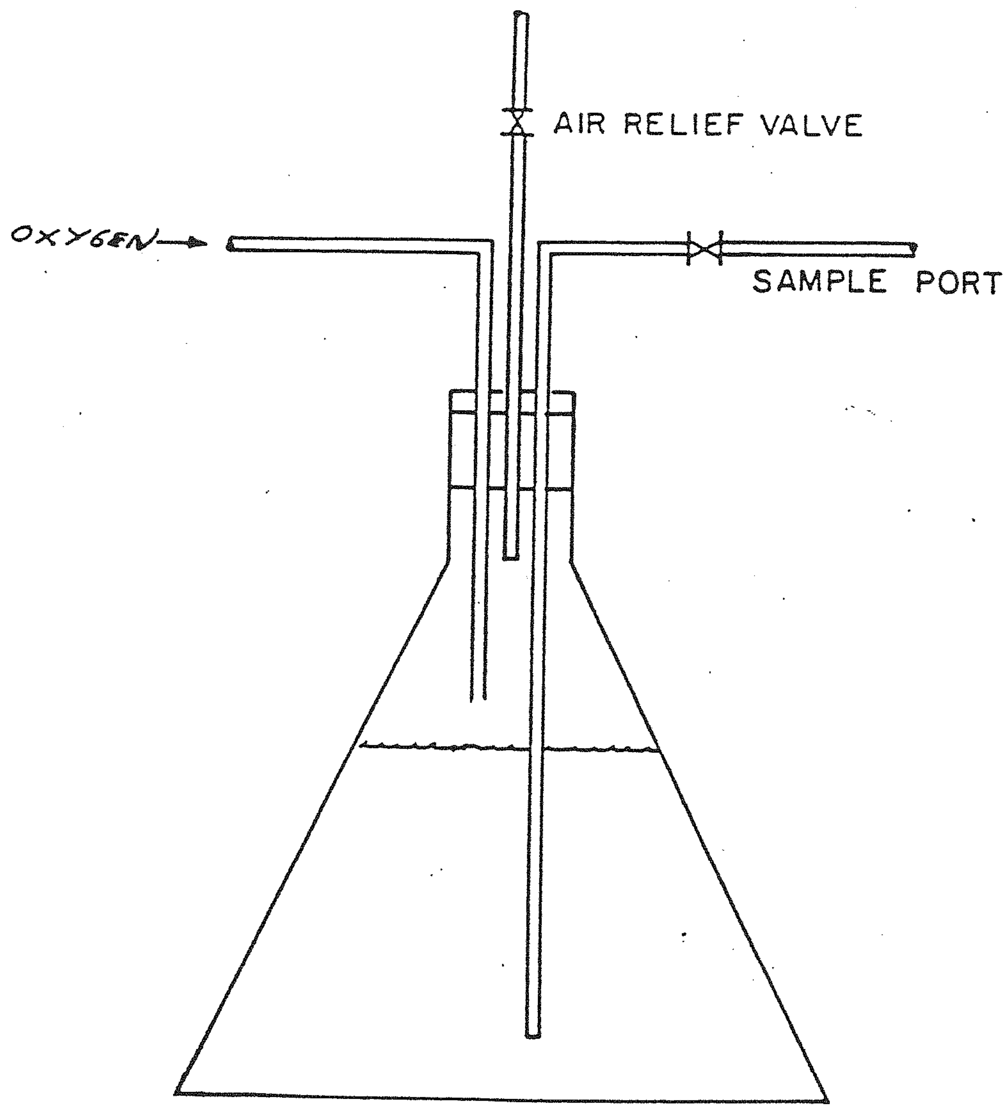
VII. Non-biodegradable TKN percentage is defined as:

$$TKN_R = \frac{TKN_j - TKN_f}{TKN_i}$$

where:

TKN_R = non-biodegradable TKN (Percent)
TKN_i = initial TKN (mg/l)
TKN_f = final TKN (mg/l)

ATTACHMENT A



REFRACTORY TKN TESTING APPARATUS

APPENDIX B

TKN Biodegradation Test Data

PROJECT .: 317-03-35
ANALYSIS BY: ENVIRONMENTAL LABORATORIES
PHASE II. 66 PERCENT KRAFT WASTEWATER

SAMPLE:BIPCO

SAMPLE A

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.19		10.40	11.90	1.58
2	7.20	8.0			
5	7.63	8.0			
10	7.42	9.6	8.67	16.60	1.17
20	7.96	8.0	6.25	16.20	0.80
30					
40	7.76	12.0	6.82	23.40	0.55
50			8.54	28.60	0.23
60	8.04	8.5	7.23	25.90	0.32
70	7.93	7.2	6.22	24.30	0.36
80					
90	8.21	8.1	5.80		

SAMPLE B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.15		12.40	14.40	1.78
2	7.19	9.4			
5	7.56	9.2			
10	7.37	11.5		14.90	1.04
20	7.83	9.6	7.82	17.30	0.77
30					
40	7.74	12.0	6.94	24.70	0.68
50		6.7	5.41	27.20	0.23
60	8.38	11.5	5.88	28.20	0.29
70	7.98		6.11	24.60	0.35
80					
90	8.20	8.3	6.51		

AVERAGE OF A & B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.17		11.40	13.15	1.68
2	7.20	8.68			
5	7.60	8.60			
10	7.40	10.55	4.34	15.75	1.11
20	7.90	8.80	7.04	16.75	0.79
30					
40	7.75	12.00	6.88	24.05	0.62
50	0.00	3.35	6.98	27.90	0.23
60	8.21	10.00	6.56	27.05	0.31
70	7.96	3.60	6.17	24.45	0.36
80					
90	8.21	8.20	6.16		

SAMPLE:DOSWELL

SAMPLE A

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.39		1.63	29.40	0.77
2	7.43	10.0			
5	7.60	10.6			
10	7.53	8.6	1.14	28.60	1.80
20	8.11	7.4	0.64	27.90	0.93
30					
40	7.73	12.5	0.93	37.80	0.77
50			0.31	39.00	0.29
60	8.31	9.3	0.40	48.90	0.23
70	8.22	7.9	1.11	41.70	0.69
80					
90	8.21	8.2	0.34		

SAMPLE B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.28		2.14	24.30	1.88
2	7.27	11.3			
5	7.49	12.0			
10	7.30	14.5	1.20	27.50	1.67
20	8.26	9.2	2.06	27.90	0.82
30					
40	8.30	13.0	0.95	39.00	0.56
50			0.32	37.10	0.32
60	8.11	6.3	0.70	38.60	0.35
70	8.07	7.6	0.49	40.80	0.58
80					
90	8.14	8.2	0.10		

AVERAGE OF A & B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.34		1.89	26.85	1.33
2	7.35	10.65			
5	7.55	11.30			
10	7.42	11.55	1.17	28.05	1.74
20	8.19	8.28	1.35	27.90	0.88
30					
40	8.02	12.75	0.94	38.40	0.67
50			0.32	38.05	0.31
60	8.21	7.80	0.55	43.75	0.29
70	8.15	7.75	0.80	41.25	0.64
80					
90	8.18	8.20	0.22		

SAMPLE:COMBINED

SAMPLE A

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.18		9.57	21.20	2.12
2	7.19	9.4			
5	7.41	9.4			
10	7.25	10.8	8.46	18.70	3.90
20	7.77	7.6	8.61	17.50	2.17
30					
40	7.54	14.5	7.36	24.90	2.80
50			7.56	53.40	0.68
60	7.84	7.9	6.58	28.90	0.66
70	7.62	7.4	6.46	29.60	0.49
80					
90	8.01	7.9	5.58		

SAMPLE B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.20		8.93	18.80	1.04
2	7.19	9.0			
5	7.41	8.5			
10	7.20	10.6	9.74	17.80	3.92
20	7.55	8.1	11.49	18.20	2.14
30					
40	7.45	10.5	7.38	27.20	0.94
50			7.53	56.90	0.49
60	7.77	8.5	7.41	28.40	0.38
70	7.85	7.6	4.43	29.40	5.94
80					
90	6.79	8.1	5.93		

AVERAGE OF A & B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.19		9.25	20.00	1.58
2	7.19	9.20			
5	7.41	8.93			
10	7.23	10.70	9.10	18.25	3.91
20	7.66	7.85	10.05	17.85	2.16
30					
40	7.50	12.50	7.37	26.05	1.87
50			7.55	55.15	0.59
60	7.81	8.20	7.00	28.65	0.52
70	7.74	7.50	5.45	29.50	3.22
80					
90	7.40	8.00	5.76		

PROJEC .: 317-03-35
ANALYSES BY: IRONMENTAL LABORATORIES
66 PERCENT SULFONATION WASTEWATER
PHASE I.

SAMPLE:BIPCO

SAMPLE A

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.17		4.12	0.30	0.15
2	7.36	15.8			
5	7.12	15.1	8.28		
10	7.24	9.6	10.10	<0.02	0.93
20	7.41	7.3		<0.02	2.84
30	7.45	6.8			
40	7.28	10.8	6.46	0.94	0.83
50	7.24	12.7	4.29	3.41	0.20
60	7.30	13.0	3.51	4.48	0.42
70	8.36	8.5	3.98	4.31	0.22
80					
90	8.59	8.0	5.69	5.96	0.38
100			3.14	6.53	0.38
114	8.18	7.3	2.03	5.49	0.11
120					
130	8.17	10.1	4.51	6.76	0.09
140	8.26	11.8	4.12	4.47	
150	8.80	16.5	2.70	5.60	

SAMPLE B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.18		5.40	0.19	0.15
2	7.90	9.20			
5	7.37	14.60			
10	7.38	8.50	1.44	<0.02	0.43
20	7.31	8.40	8.54	0.07	1.68
30	7.35	6.80			
40	7.28	12.00	6.56	0.85	0.83
50	7.29	14.90	5.83	1.42	0.31
60	7.25	15.10	5.16	2.36	0.28
70	8.47	9.40	6.00	2.50	0.22
80					
90	8.79	9.00	7.16	3.51	0.91
100			5.08	5.99	0.17
114	8.19	7.70	7.78	9.19	<0.02
120					
130	8.15	10.50	3.65	7.00	0.13
140	8.34	12.80	3.83	4.47	
150	8.92	16.00	3.64	5.21	

AVERAGE OF A & B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.18		4.76	0.25	0.15
2	7.63	12.50			
5	7.25	14.85	4.14		
10	7.31	9.05	5.77		0.68
20	7.36	7.85	4.27	0.04	2.26
30	7.40	6.80			
40	7.28	11.40	6.51	0.90	0.83
50	7.27	13.80	5.06	2.42	0.26
60	7.28	14.05	4.34	3.42	0.35
70	8.42	8.95	4.99	3.41	0.22
80					
90	8.69	8.50	6.43	4.74	0.65
100			4.11	6.26	0.28
114	8.19	7.50	4.91	7.34	0.06
120					
130	8.16	10.30	4.08	6.88	0.11
140	8.30	12.30	3.98	4.47	
150	8.86	16.25	3.17	5.41	

SAMPLE:DOSWELL

SAMPLE A

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.25		5.54	14.66	2.01
2	7.69	16.50			
5	7.56	16.80			
10	7.60	9.60	6.02	1.25	3.08
20	6.90	8.80	1.75	12.50	0.55
30	7.24	7.18			
40	7.40	12.70	1.09	14.40	0.25
50	7.33	14.40	1.12	20.95	0.29
60	7.30	14.50	<0.10	18.29	0.27
70	8.58	7.10	<0.10	22.40	0.23
80					
90	8.10	13.50	0.68	41.60	0.24
100			0.38	26.00	0.65
114	8.15	7.80	0.53	18.03	0.15
120					
130	7.66	10.30	0.52	24.00	0.08
140	8.22	12.00	0.81	15.20	
150	8.84	18.50	0.53	17.50	

SAMPLE B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.22		6.09	12.73	1.95
2	7.14	6.80			
5	6.82	10.40			
10	7.00	10.20	5.15	7.75	3.36
20	6.50	11.10	2.47	9.89	1.25
30	6.83	7.40			
40	7.08	12.00	1.20	14.40	0.17
50					
60					
70					
80					
90					
100			CONTAMINATED		
114					
120					
130					
140					
150					

AVERAGE OF A & B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.24		5.82	13.70	1.98
2	7.42	11.65			
5	7.19	13.60			
10	7.30	9.90	5.59	4.50	3.22
20	6.70	9.95	2.11	11.20	0.90
30	7.04	7.29			
40	7.24	12.35	1.15	14.40	0.21
50					
60					
70					
80					
90					
100					
114					
120					
130					
140					
150					

SAMPLE:COMBINED

SAMPLE A

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.26		6.30	2.18	0.81
2	7.42	15.00			
5	7.28	13.40			
10	7.36	10.10	4.60	0.52	1.18
20	7.29	8.30	7.49	1.02	2.24
30	7.23	6.80			
40	7.24	11.00	5.49	0.20	0.36
50	7.33	11.90	4.84	4.29	
60	7.40	11.50	1.49	6.04	
70	8.57	7.90	5.04	6.22	
80					
90	9.04	8.40	7.25	8.48	0.20
100			6.77	14.32	0.46
114	8.20	9.70	7.04	9.99	0.23
120					
130	8.12	10.90	4.11	12.83	0.28
140	8.35	12.50	4.91	8.65	
150	9.11	13.50	7.11	NA	

SAMPLE B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.23		6.01	2.16	0.69
2	7.47	14.20			
5	7.26	15.80			
10	7.27	9.80	6.12	0.46	1.52
20	7.08	10.20	7.39	0.81	1.23
30	7.13	6.73			
40	7.26	13.50	6.02		0.14
50	7.36	13.30	5.26	3.79	
60	7.43	13.20	5.79	4.56	
70	8.46	9.60	5.79	4.16	
80					
90	8.43	9.50	7.50	5.33	0.41
100			5.20	7.73	0.19
114	8.17	7.70	4.34	<.02	0.15
120					
130	8.19	10.70	4.04	9.50	0.15
140	8.33	12.00	3.25	6.29	
150	8.74	16.50	3.91	7.49	

AVERAGE OF A & B

TIME DAYS	pH	DO mg/l	TKN mg/l	NO2/NO3-N mg/l	NH3-N mg/l
0	7.25		6.16	2.17	0.75
2	7.45	14.60			
5	7.27	14.60			
10	7.32	9.95	5.36	0.49	1.35
20	7.19	9.25	7.44	0.92	1.74
30	7.18	6.77			
40	7.25	12.25	5.76	0.10	0.25
50	7.35	12.60	5.05	4.04	
60	7.42	12.35	3.64	5.30	
70	8.52	8.75	5.42	5.19	
80					
90	8.74	8.95	7.38	6.91	0.31
100			5.99	11.03	0.33
114	8.19	8.70	5.69	5.00	0.19
120					
130	8.16	10.80	4.08	11.17	0.22
140	8.34	12.25	4.08	7.47	0.00
150	8.93	15.00	5.51	3.75	0.00

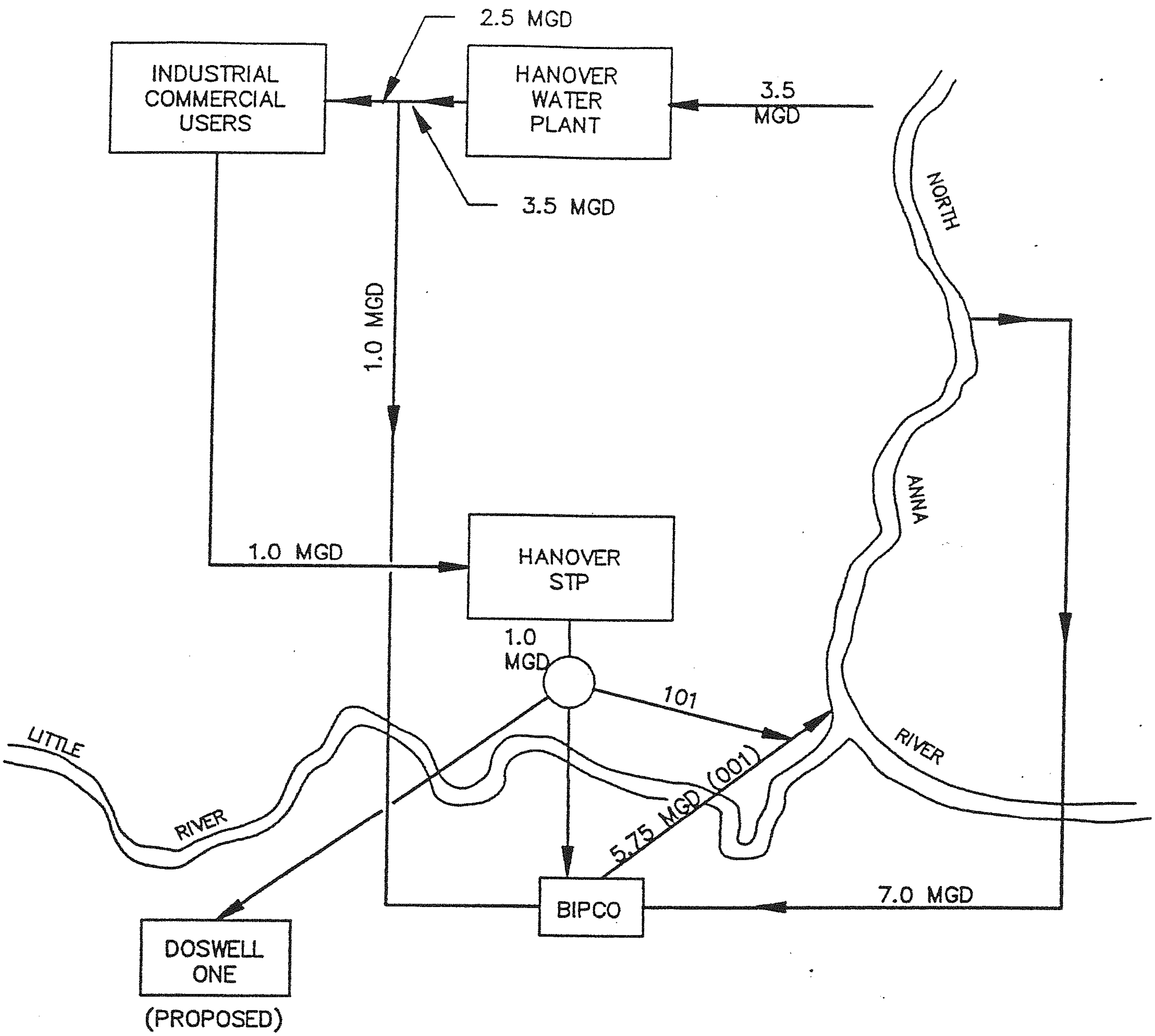
Attachment 12

Three schematics that address the proposed mill expansion at Bear Island are attached:

1. Overall water flow schematic reflecting the Bear Island mill expansion

2. Proposed upgrade of wastewater treatment facilities at Bear Island

3. Detail of proposed effluent oxygenation



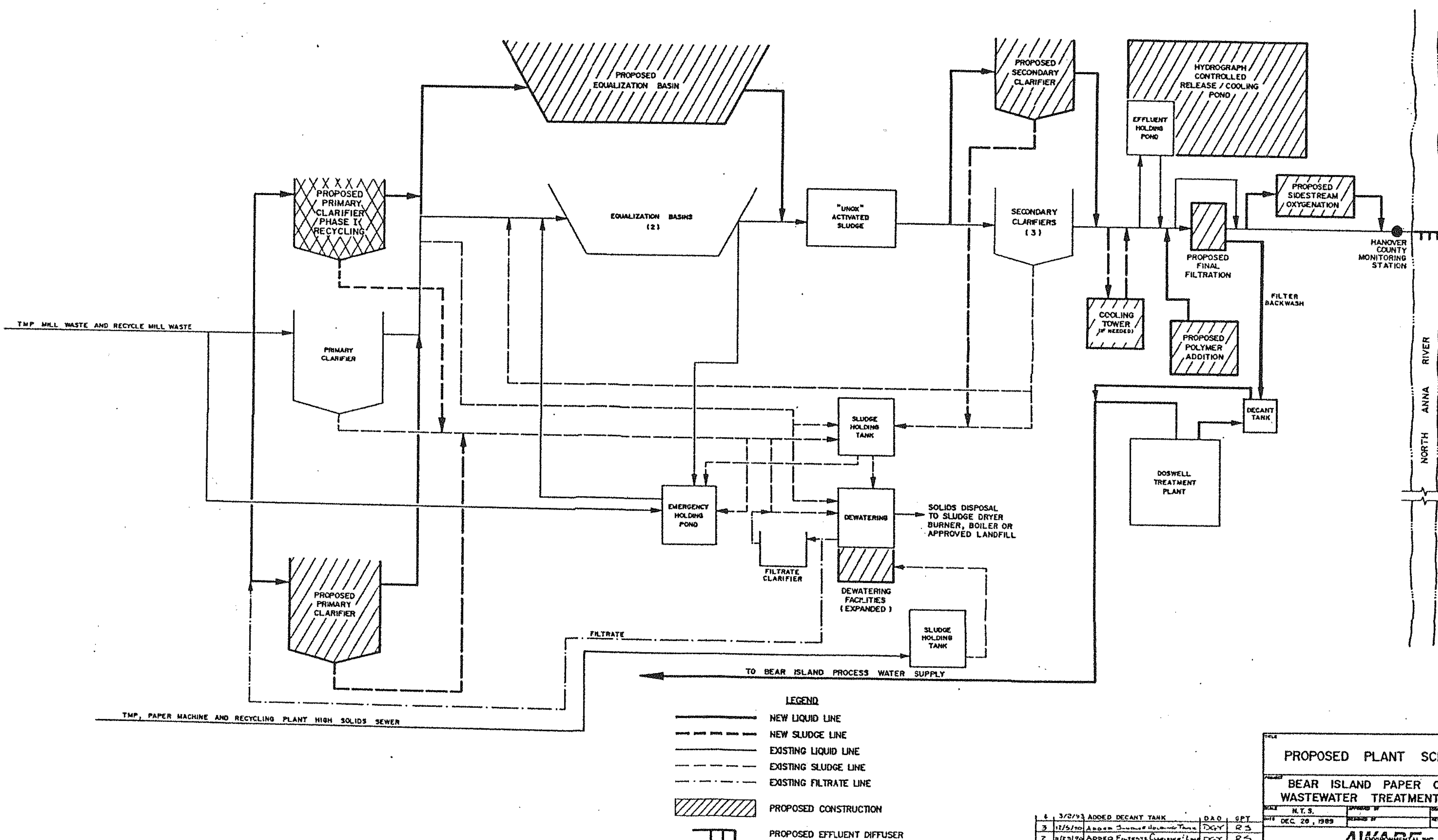
NOTE: THE 1.0 MGD EFFLUENT FROM THE COUNTY WWTP CAN BE DISPOSED THROUGH ANY OF THE 3 ROUTES (OR COMBINATION THEREOF):

A) TO DOSWELL ONE: 0.4 TO 1.0 MGD

B) TO BIPCO: 0.2 TO 1.0 MGD

C) TO THE RIVER THROUGH OUTFALLS 101–001: 0.0 TO 1.0 MGD IN CASE BOTH DOSWELL ONE AND BIPCO ARE NOT OPERATIONAL.

PROJECT WATER WITHDRAWAL		
BEAR ISLAND PAPER COMPANY, L.P. ASHLAND, VIRGINIA		
SCALE NOT TO SCALE	APPROVED BY :	DRAWN BY: D.A.O.
DATE MAY 1994	DESIGNED BY :	REVISED
PROJECT NUMBER N106-01		DRAWING NO.



NO.	DATE	REVISIONS	MADE	APPROVED
4	3/2/93	ADDED DECANT TANK	DAO	GPT
3	12/5/90	Added Sludge Holding Tank	DGY	RS
2	8/23/90	Added Filtrate Clarifier Line	DGY	RS
1	9/29/89	Modified Cooling Tower	JLS	GPT

PROPOSED PLANT SCHEMATIC

BEAR ISLAND PAPER COMPANY
WASTEWATER TREATMENT PLANT

SCALE: N.T.S.
DATE: DEC. 20, 1989
DRAWN BY: FFH

AWARE ENVIRONMENTAL INC.

PROJECT NUMBER: N 106-01

FILE NAME: 10601p01 (08-13-93)

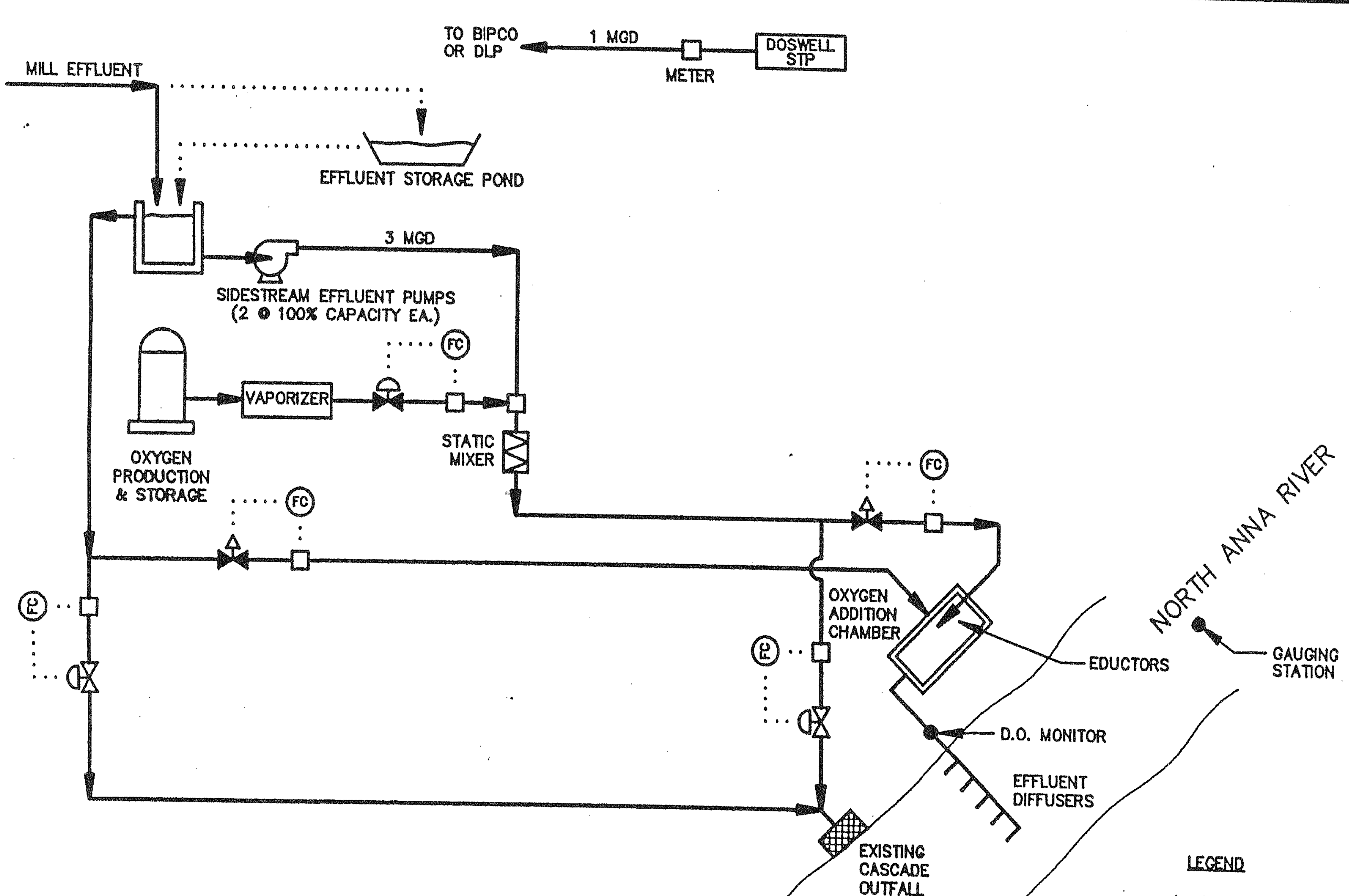


FIGURE 2
CONCEPTUAL LAYOUT OF OXYGENATION SYSTEM
NOT TO SCALE

Attachment 13

Attachment 13 includes Attachments 13A and 13B. **Attachment 13A** develops the control equation for a mill expansion consisting only of a second, TMP paper line. As the mill now uses recycled paper, and therefore, the expansion would also use recycled paper (approximately 40% recycled newsprint), the control equation was reevaluated in regard to the larger water use associated with recycled paper. **Attachment 13B** discusses those revisions. As it turns out, the control equation remained the same, but the dissolved oxygen requirements changed.

Attachment 13A

SECTION 7.0

1987 MODEL SIMULATIONS

Computer simulations were performed using various input conditions to define the capacity of the river to assimulate wastewater in compliance with the SWCB anti-degradation policy. All model simulations used the calibrated model presented in Section 5.0.

7.1 General Aproach

The modeling for the proposed mill expansion uses the same approach as previous models of the North Anna, except that this model uses the actual stream data to define model parameters and input conditions (Section 3.0). The model was used to evaluate discharge at the wasteload allocation defined in the York River Plan (690 lbs $CBOD_5$ per day). The allowable in-stream UCBOD of the wastewater was then used in the mass balance equation (of the wastewater-river mix) to define effluent limits, which can be expressed in terms of an effluent limitation control equation.

The modeling analysis and controls for the proposed mill expansion have been based on the ultimate and 5-day carbonaceous BOD. The 16th edition of Standard Methods for the Analysis of Water and Wastewater (Greenberg et al, 1985) has introduced a procedure for carbonaceous analysis as the method to differentiate $CBOD_5$ and nitrogenous oxygen demand.

For this modeling analysis, the South Anna River DO is given as a function of the temperature of the North Anna River, as developed from probability distributions of DO data collected by Hanover County since 1982. For example, for days when the North Anna temperature was 25^{o}C, the 90th percentile DO in the South Anna River was 6.46 mg/l (Figure 6-5). The measured 90th percentile South Anna DO values are presented as a function of North Anna temperature in Figure 7-1. (The DO is related to the North Anna temperature, since the North Anna temperature is the critical temperature for the modeling.) A relationship function which may be used to estimate the 90th percentile DO from a given North Anna temperature is

$$\text{SA DO 90} = 12.97 - 0.4058\ (\text{NA TEMP}) + 0.005734\ (\text{NA TEMP})^2 \qquad (7\text{-}1)$$

where

SA DO 90 = 90th percentile South Anna DO (mg/l),

NA TEMP = North Anna temperature (^{o}C).

From this function, the South Anna DO input condition may be obtained for any North Anna temperature.

A summary of model parameters and input conditions which have been used in the model simulations is presented in Table 7-1.

The model was used to determine the allowable $CBOD_5$ loadings and the required initial in-stream DO concentrations which would meet the SWCB anti-degradation policy. It was anticipated that supplemental effluent oxygenation would be required under certain conditions to attain the necessary in-stream DO mix.

7.2 Oxygenation of Effluent

Applying Henry's Law to a water column in the presence of an oxygen-containing gas, the equilibrium DO in the water is directly proportional to the partial pressure of oxygen in the overlying gas. This may be expressed as

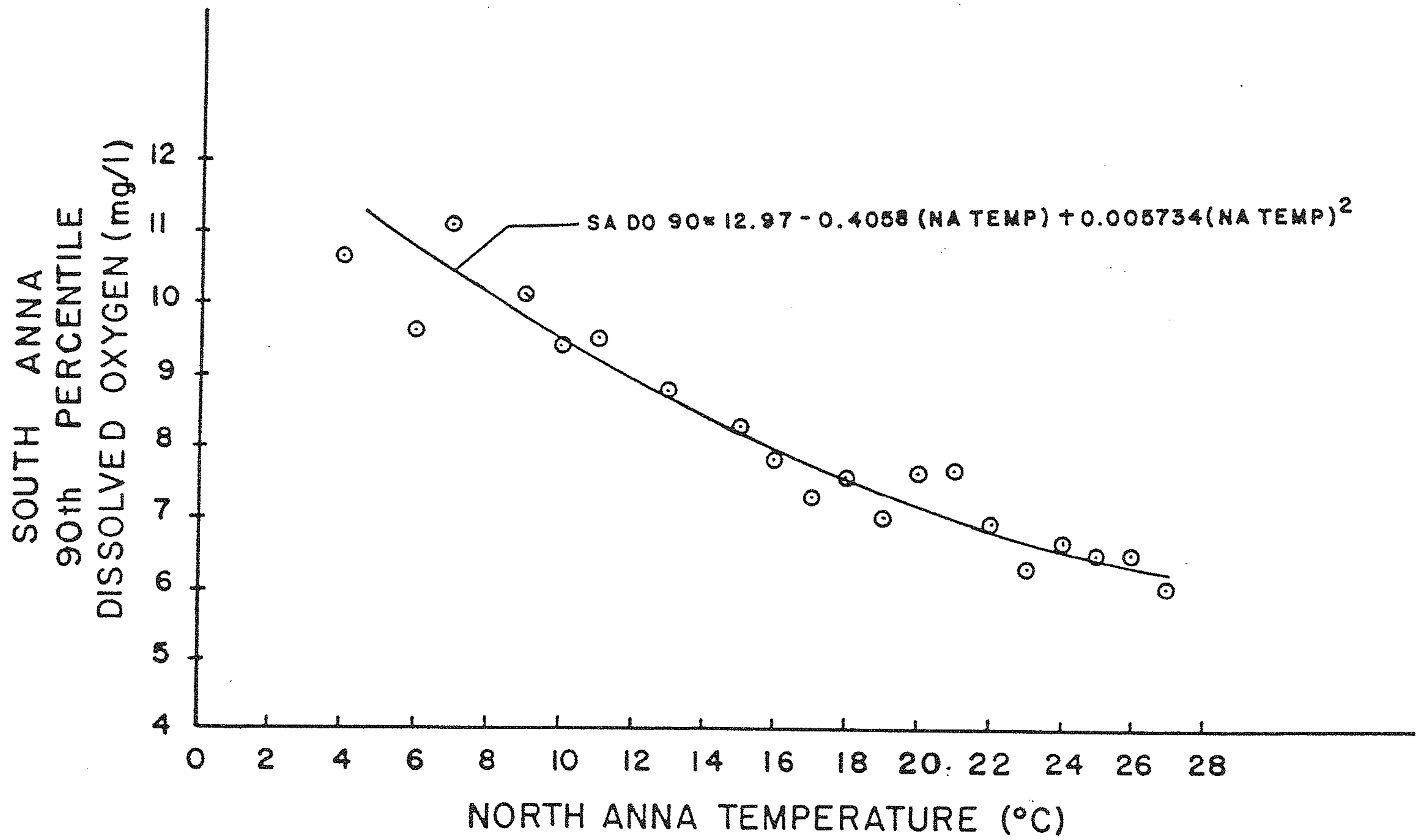


FIGURE 7-1. THE 90TH PERCENTILE SOUTH ANNA DISSOLVED OXYGEN VS. NORTH ANNA TEMPERATURE.

TABLE 7-1

MODEL PARAMETERS AND INPUT CONDITIONS

Model Parameters: Reaction Rates (20°C)

Stream Reach	K_1-20°C	K_2-20°C	K_N-20°C	$SOD_{20°C}$
1	0.11	1.30	0.30	5.0
2	0.11	1.00	0.20	2.0
3	0.11	1.90	0.20	1.8
4	0.10	2.00	0.20	2.5
5	0.10	2.50	0.20	1.5

Model Input Conditions		Justification
TKN Doswell	10 mg/l	Section 6.4; Appendix J
Flow Doswell	4.5 MGD	Anticipated flow after expansion
Water Withdrawal	10.5 MGD	Section 6.3
Headwater $CBOD_u$	4.2 mg/l	Average (Aug. 19, Oct. 13 & 15)
Headwater TKN	0.4 mg/l	Average (Aug. 19, Oct. 13 & 15)
Little River $CBOD_u$	2.5 mg/l	Average (Oct. 13, Oct. 15)
Little River TKN	0.5 mg/l	Average (Oct. 13, Oct. 15)
South Anna $CBOD_u$	3.6 mg/l	Average (Aug. 19, Oct. 13 & 15)
South Anna TKN	0.50 mg/l	Average (Aug. 19, Oct. 13 & 15)
South Anna DO	12.97 - 0.4058 (NA TEMP) + 0.005734 $(\text{NA TEMP})^2$ where NA temp = North Anna temperature (°C). (This is equation 7-1.)	

$$C_s = \frac{1}{H_e'} P_o$$

where

C_s = saturated DO (mg/l),

H_e' = Henry's Constant (atm-l/mg),

P_o = partial pressure of oxygen (atm).

For example, for water at 20°C in the presence of atmospheric air, H_e' = 0.023 atm-l/mg, P_o = 0.209 atm, and C_s = 9.09 mg/l.

At a given temperature, the equilibrium DO increases with increasing partial pressure of the oxygen in the overlying gas. This may be accomplished by (1) increasing the percentage of oxygen in the overlying gas, and/or (2) increasing the gage pressure of the oxygen-containing gas. For example, replacing atmospheric air (P_o = 0.209 atm) with pure oxygen (P_o = 1.0 atm) would result in a saturated DO of C_s = 43.47 mg/l at 20°C and standard atmospheric pressure.

A number of papers pertaining to post-aeration are presented in Appendix M.

7.3 Deaeration Under Supersaturated Conditions

According to Thomann and Mueller (1987), the transfer of a chemical across the air-water interface at atmospheric pressure may be derived from

$$V \frac{dC}{dt} = k_l A \left(\frac{C_g}{H_e} - fC\right) \qquad (7\text{-}2)$$

where

V = volume of water column (L^3),

C = chemical concentration in the water column (M/L^3),

t = time (T),

k_l = overall exchange coefficient (L/T),

A = surface area (L^2),

C_g = chemical concentration in the overlying air (M/L^3),

H_e = Henry's constant,

f = fraction of total chemical which is dissolved.

The equation shows that flux of a chemical may be from the air to the water (if C_g/H_e is greater than fC) or from the water to the air (if fC is greater than C_g/H_e). Application of the two-film theory results in the overall transfer coefficiency being given as

$$\frac{1}{k_l} = \frac{1}{K_l} + \frac{1}{K_g H_e} \tag{7-3}$$

where

K_l = liquid film coefficient (L/T),

K_g = gas film coefficient (L/T).

This theory may be applied to the transfer of oxygen across an air-water interface. In such case, C_g/H_e is the saturated DO concentration and $f = 1$. Since H_e is relatively high, the oxygen transfer rate is controlled by the liquid phase. The reaeration coefficient is given by

$$K_2 = \frac{k_l A}{V} \tag{7-4}$$

where K_2 is the atmospheric reaeration coefficient (T^{-1}). Thus, for oxygen transfer, equation 7-2 may be written as

$$\frac{dC}{dt} = K_2 \ (C_s - C) \tag{7-5}$$

where C_s is the saturated DO concentration (M/L^3). As with equation 7-2, the solution to equation 7-5 does not depend on the sign of the right-hand side. In terms of DO deficit, the solution is given by

$$D = D_o \exp(-K_2 t) \tag{7-6}$$

where

$D = C_s - C$ = oxygen deficit (M/L^3),

D_o = initial oxygen deficit (M/L^3)

Since equation 7-2 is applicable to mass flow in either direction, it follows that equation 7-6 is appropriate for both reaeration and deaeration.

Similarly, equation 3-1 may be applied to supersaturated water, although there are some important assumptions involved. First, it must be assumed that the CBOD and NBOD decay processes are not affected by the existance of supersaturated conditions. Also, it must be assumed that SOD will not be affected by the additional oxygen. The use of equation 3-1 to evaluate supersaturated conditions is a common practice (Thomann, 1987).

A number of papers pertaining to post-aeration and deaeration under supersaturated conditions are presented in Appendix M.

7.4 Model Simulations

The calibrated Streeter-Phelps model (as described in Section 5.0) indicates that a natural DO sag would exist in the North Anna River. Therefore, the upstream dissolved oxygen concentrations are adjusted to maintain the critical river DO at the sag location. The DO concentrations required at NA-3.5 to maintain the critical background DO throughout the North Anna River are presented in Table 7-2 for each season. The modeling used to develop these required DO levels was based on critical temperatures, 7Q10 flow, and upstream CBOD and TKN values measured during the data acquisition phase of this study (Table 7-1).

7.4.1 Model Simulations for Spring Season

For the months of April, May, and June, the critical temperature is 24°C and the critical background DO is 6.43 mg/l (Table 7-2). The model indicates that the minimum DO of 6.23 mg/l (6.43 mg/l minus 0.2 mg/l) can be maintained at 7Q10 flow in the North Anna River for an initial in-stream $UCBOD_5$ mix of 20.04 mg/l (4.5 MGD and 690 lbs $CBOD_5$ per day), if the initial in-stream DO mix is 11.70 mg/l (Figure 7-2). For an upstream DO of 7.90 mg/l (Table 7-2), this requires effluent oxygenation to a concentration of 27 mg/l, based on a mass balance at the discharge point.

The model indicates that with the maximum mill discharge (5.4 MGD and 1,350 lbs $CBOD_5$ per day), a North Anna flow of 92.73 cfs, and an upstream DO of 7.90 mg/l; the minimum DO of 6.23 mg/l can be maintained in the North Anna River without supplemental effluent oxygenation (Figure 7-3).

The model indicates that with the maximum combined discharge of the mill and the storage ponds (21.2 MGD and 5,300 lbs $CBOD_5$ per day), a North Anna flow of 218.73 cfs, and an upstream DO of 7.90

TABLE 7-2

SUMMARY OF EFFLUENT OXYGENATION REQUIREMENTS AND ALLOWABLE DISCHARGES

Line		Spring	Summer	Fall	Winter
1	Critical Temperature (°C)	24	27	16	11
2	Critical DO (mg/l)	6.43	5.97	7.87	8.91
3	Initial DO to maintain critical DO throughout North Anna for no effluent at critical temperature and 7Q10 flow (mg/l)[a]	7.90	7.73	8.75	9.31
4	Minimum DO (mg/l)[b]	6.23	5.77	7.67	8.71
5	Initial in-stream DO required at 7Q10 flow and discharge of 690 lbs $CBOD_5$ per day to maintain minimum DO (Line 4) throughout the North Anna (mg/l)[c]	11.70	12.65	10.50	9.93
6	Effluent O_2 requirement at 7Q10 flow and discharge of 690 lbs per day, based on an upstream DO in the North Anna equal to Line 3 (mg/l)[c]	27	32	17	12
7	North Anna flow above which no O_2 is required (cfs):[c]				
7(a)	Discharge = 1,350 lbs $CBOD_5$ per day	92.73	97.73	86.73	79.73
7(b)	Discharge = 5,300 lbs $CBOD_5$ per day	218.73	222.73	195.73	175.73

[a] From modeling (Appendix I)

[b] Critical DO minus 0.2 mg/l.

[c] Sections 7.4.1 through 7.4.4.

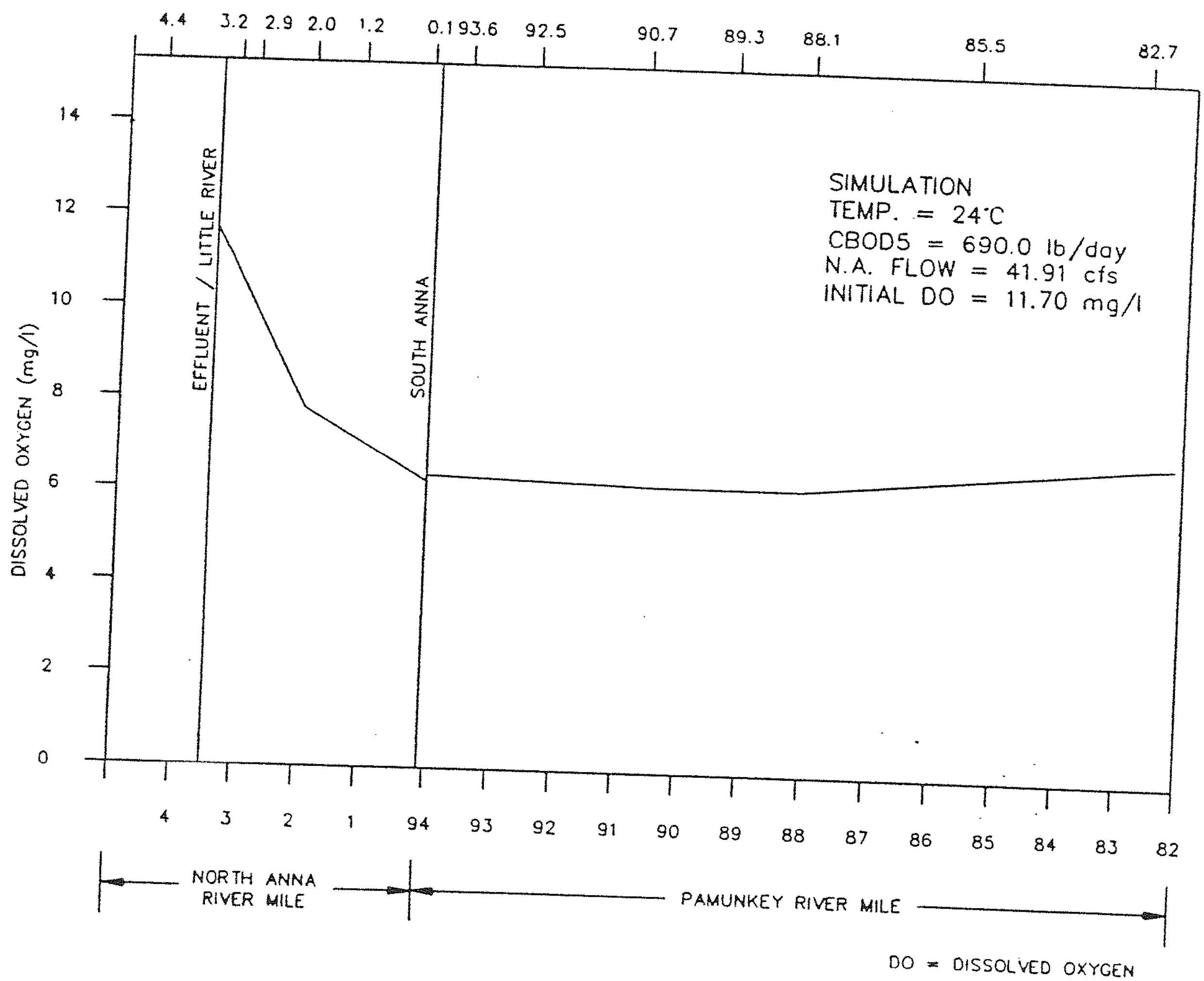


FIGURE 7-2. DISSOLVED OXYGEN PROFILE FOR 7Q10 FLOW, TEMPERATURE OF 24°C INITIAL UCBOD OF 20.04 MG/L, AND INITIAL DISSOLVED OXYGEN OF 11.70 MG/L.

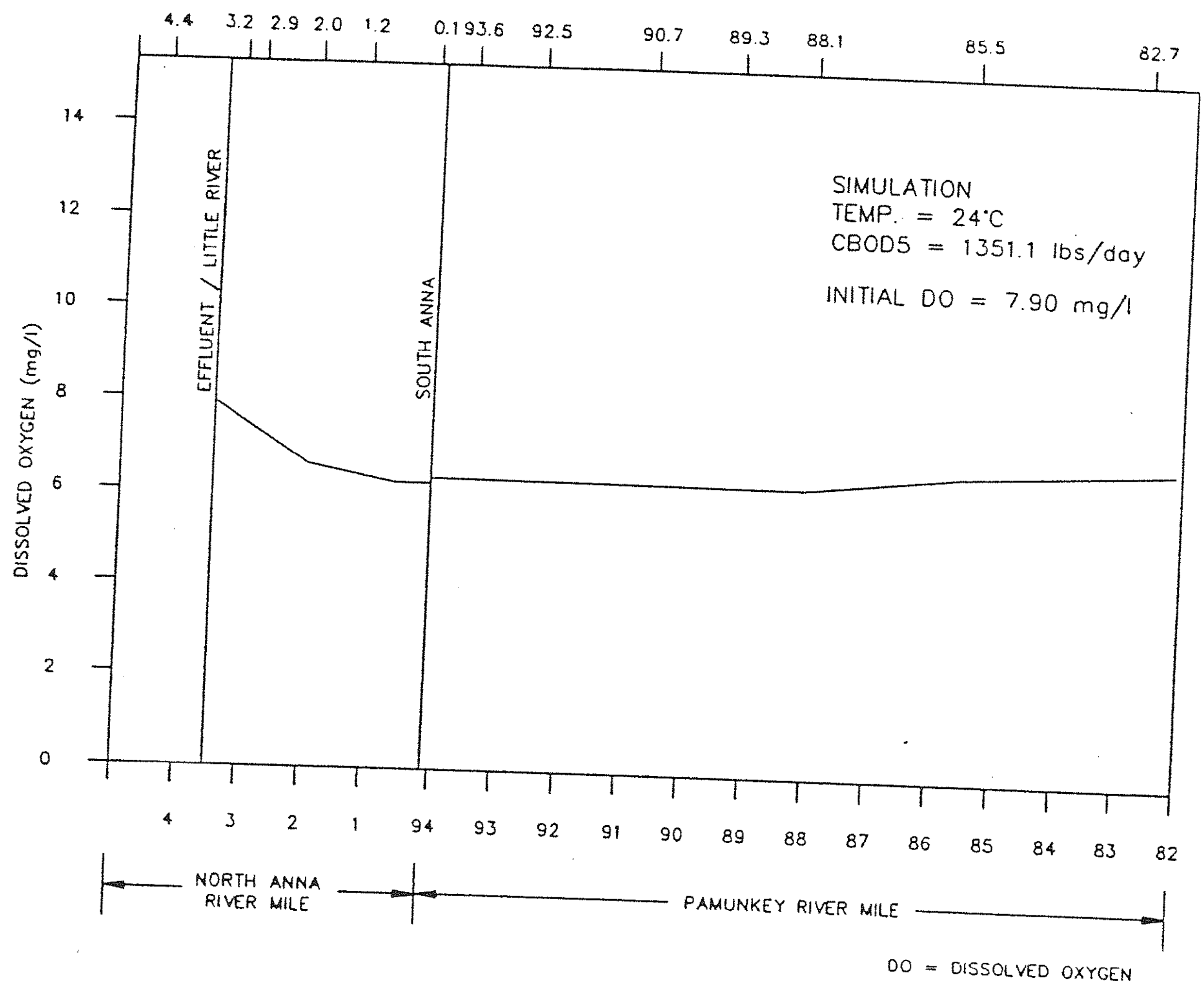


FIGURE 7-3. DISSOLVED OXYGEN PROFILE FOR FLOW OF 92.73 CFS, TEMPERATURE OF 24°C INITIAL UCBOD OF 14.48 MG/L, AND INITIAL DISSOLVED OXYGEN OF 7.90 MG/L.

mg/l; the minimum DO of 6.23 mg/l can be maintained without supplemental effluent oxygenation (Figure 7-4).

7.4.2 Model Simulation For Summer Season

For the months of July, August, and September, the critical temperature is 27°C and the critical background DO is 5.97 mg/l (Table 7-2). The model indicates that the minimuim DO of 5.77 mg/l (5.97 mg/l minus 0.2 mg/l) can be maintained at 7Q10 flow in the North Anna River for an initial in-stream UCBOD mix of 20.04 mg/l (4.5 MGD and 690 lbs $CBOD_5$ per day), if the initial in-stream DO mix is 12.65 mg/l. For an upstream DO of 7.73 mg/l (Table 7-2), this requires effluent oxygenation to a concentration of 32 mg/l, based on a mass balance at the discharge point.

The model indicates that with the maximum mill discharge, a North Anna flow of 97.7 cfs, and an upstream DO of 7.73 mg/l; the minimum DO of 5.77 mg/l can be maintained in the North Anna River without supplemental effluent oxygenation.

The model indicates that with the maximum combined discharge of the mill and the storage ponds, a North Anna flow of 222.7 cfs, and an upstream DO of 7.73 mg/l; the minimum DO of 5.77 mg/l can be maintained without supplemental effluent oxygenation.

7.4.3 Model Simulation For Fall Season

For the months of October, November, and December, the critical temperature is 16°C and the critical background DO is 7.87 mg/l (Table 7-2). The model indicates that the minimuim DO of 7.67 mg/l (7.87 mg/l

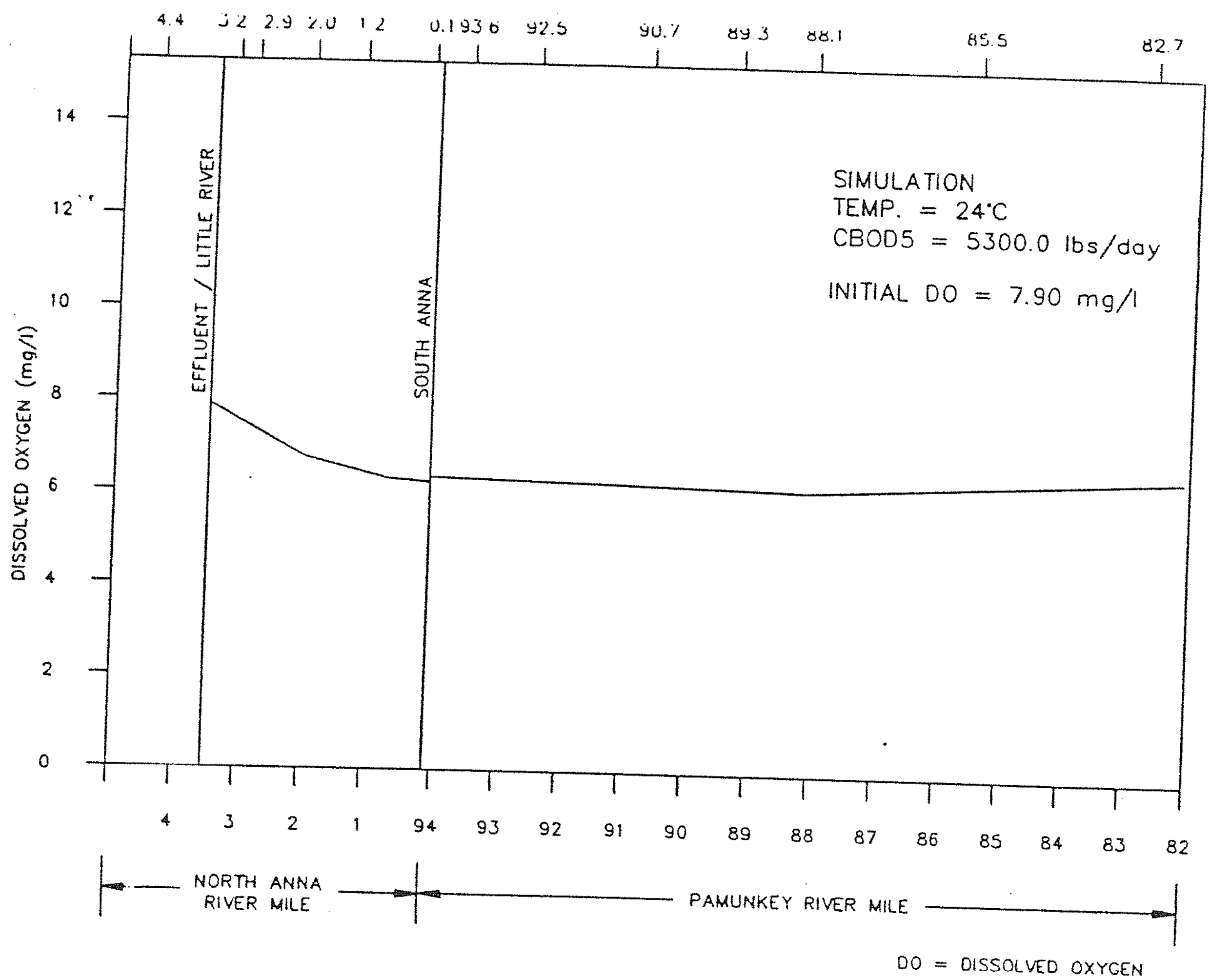


FIGURE 7-4. DISSOLVED OXYGEN PROFILE FOR FLOW OF 218.7 CFS, TEMPERATURE OF 24°C INITIAL UCBOD OF 20.56 MG/L, AND INITIAL DISSOLVED OXYGEN OF 7.90 MG/L.

minus 0.2 mg/l) can be maintained at 7Q10 flow in the North Anna River for an initial in-stream UCBOD mix of 20.04 mg/l (4.5 MGD and 690 lbs $CBOD_5$ per day), if the initial in-stream DO mix is 10.50 mg/l. For an upstream DO of 8.75 mg/l (Table 7-2), this requires effluent oxygenation to a concentration of 17 mg/l, based on a mass balance at the discharge point.

The model indicates that with the maximum mill discharge, a North Anna flow of 86.7 cfs, and an upstream DO of 8.75 mg/l; the minimum DO of 7.67 mg/l can be maintained in the North Anna River without supplemental effluent oxygenation.

The model indicates that with the maximum combined discharge of the mill and the storage ponds, a North Anna flow of 195.7 cfs, and an upstream DO of 8.75 mg/l; the minimum DO of 7.67 mg/l can be maintained without supplemental effluent oxygenation.

7.4.4 Model Simulation For Winter Season

For the months of January, February, and March, the critical temperature is 11°C and the critical background DO is 8.91 mg/l (Table 7-2). At the critical temperature of 11°C, it was assumed that the NBOD deoxygenation coefficient (K_N) is equal to zero. The model indicates that the minimuim DO of 8.71 mg/l (8.91 mg/l minus 0.2 mg/l) can be maintained at 7Q10 flow in the North Anna River for an initial in-stream UCBOD mix of 20.04 mg/l (4.5 MGD and 690 lbs $CBOD_5$ per day), if the initial in-stream DO mix is 9.93 mg/l. For an upstream DO of 9.31 mg/l (Table 7-2), this requires effluent oxygenation to a concentration of 12 mg/l, based on a mass balance at the discharge point.

The model indicates that with the maximum mill discharge, a North Anna flow of 79.7 cfs, and an upstream DO of 9.31 mg/l; the minimum DO of 8.71 mg/l can be maintained in the North Anna River without supplemental effluent oxygenation.

The model indicates that for the maximum combined discharge of the mill and the storage ponds, a North Anna flow of 175.7 cfs, and an upstream DO of 9.31 mg/l, the minimum DO of 8.71 mg/l can be maintained without supplemental effluent oxygenation.

7.4.5 Summary

The allowable $CBOD_5$ discharges and effluent oxygenation requirements are summarized in Table 7-3.

TABLE 7-3

SUMMARY OF EFFLUENT OXYGENATION REQUIREMENTS

	Spring	Summer	Fall	Winter
Critical Temperature (^oC)	24	27	16	11
Effluent O_2 requirement (mg/l)	27	32	17	12
North Anna flow above which no O_2 is required (cfs):				
a. Normal mill discharge	92.73	97.73	86.73	79.73
b. Normal mill discharge plus release from hydrograph-controlled release pond	218.73	222.73	195.73	175.73

SECTION 8.0

PROPOSED NPDES CRITERIA

The proposed NPDES criteria are based on maintaining the SWCB anti-degradation policy in the North Anna River. The results of the modeling indicate that the addition of oxygen to the effluent using pure oxygen is required when the river flow is less than 100 cfs and there is no discharge from the hydrograph-controlled release lagoon, and up to river flow of 235 cfs when there is a discharge from the hydrograph-controlled release lagoon. A cascade type aeration system, similar to the existing unit, will be used in all other discharge cases.

8.1 Allowable CBOD

The current permit has a control equation which regulates the allowable effluent discharge in proportion to the river flow. At higher stream flows, the allowable discharge is increased. The control equation has been updated based on the results of the modeling (Table 7-2).

The control equation is based on solving a mass balance around the UCBOD mix in the river. The results of the modeling indicated a critical UCBOD mix in the river of 20.04 mg/l. The control equation will define allowable discharge $CBOD_5$ in lbs/day. The basic mass balance is:

Input Load (North Anna - Withdrawal + Little River + Effluent) = UCBOD mix in river (8-1)

$$\frac{(Q_u - Q_w)\ (4.2) + (1.77)\ (2.5) + (6.98)\ S_o\ (8.34)}{Q_u - Q_w + 1.77 + 6.98} = 20.04$$

where

Q_u = stream flow in North Anna River before withdrawal (cfs),

Q_W = withdrawal from North Anna (cfs),

S_o = UCBOD of effluent (mg/l).

The allowable $CBOD_5$ discharge in lb/day can be defined as

$$\text{Allowable CBOD5} = \frac{S_o}{F} (QD)\ 8.34$$

where

$F = CBOD_u/CBOD_5$,

Q_D = effluent discharge flow (MGD).

This mass balance is solved for allowable $CBOD_5$, based on monitoring of the North Anna River flow at the Doswell discharge gage. Hanover County would initiate continuous monitoring of the flow in the river, which could be accomplished by telemetry from a gaging station located immediately upstream (approximately within 100 ft) of the effluent discharge (Figure 2.2). A typical cross section of this gaging location during low-flow conditions is presented in Figure 8-1. A gaging station at this location would allow measurement of the actual flow in the river.

The proposed effluent criteria would be defined by the following control equation:

$$\text{Allowable } CBOD_5 = 18.97\ Q_s + 204.77 \qquad (8\text{-}2)$$

where Q_s = stream flow in North Anna River after withdrawal.

The derivation of this equation from the mass balance is presented in Table 8-1. This control equation would be valid under all conditions. This equation would apply for all temperatures up to a maximum $CBOD_5$ level of 5,300 lb/day. A graphical interpretation of equation 8-2 is presented in Figure 8-2.

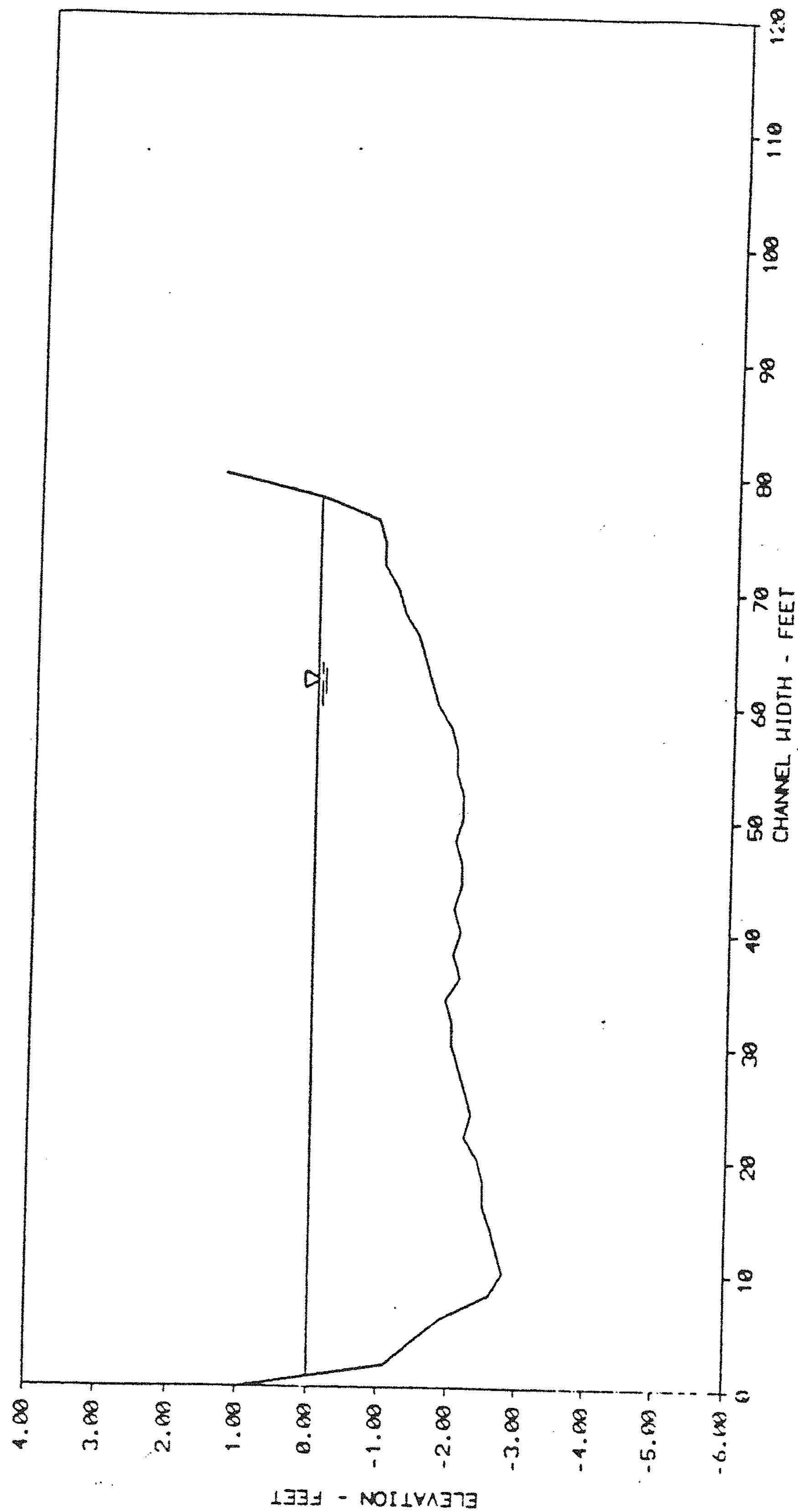


FIGURE 8-1. TYPICAL CROSS SECTION OF PROPOSED GAGING STATION

TABLE 8-1

DERIVATION OF CONTROL EQUATION

The mass balance of (In-stream $CBOD_u$ Mix = Input Flow) is solved:

$$\text{In-stream UCBOD Mix} = \frac{(Q_S)(CBOD_{u1}) + (Q_{LR})(CBOD_{u2}) + Q_D(S_o)}{Q_S + Q_{LR} + Q_D} \qquad (1)$$

where

Input Load = (North Anna - withdrawal + Little River + Effluent)/(Total Flow)

In-stream UCBOD Mix = 20.04 (from Section 7.4 model simulations)

Q_S = stream flow in North Anna after withdrawal (cfs)

$CBOD_{u1}$ = ultimate CBOD in North Anna = 4.2 mg/l (from Table 7-1)

$CBOD_{u2}$ = ultimate CBOD in Little River = 2.5 mg/l (from Table 7-1)

Q_{LR} = 7Q10 stream flow in the Little River (cfs)

Q_D = effluent discharge flow = 6.98 cfs

S_o = effluent ultimate CBOD

F = $CBOD_u/CBOD_5$ = 4.5 (from Table 4-5)

Conversions: mg/l x MGD x 8.34 = lbs/day

MGD x 1.547 = cfs

Solving:

$$20.04 = \frac{(Q_S)(4.2) + 1.77(2.5) + 6.98(S_o)}{Q_S + 1.77 + 6.98}$$

$$20.04 = \frac{4.2(Q_S) + 4.425 + 6.98(S_o)}{Q_S + 8.75}$$

(continued)

TABLE 8-1 (continued)

DERIVATION OF CONTROL EQUATION

In terms of S_o:

$$S_o = \frac{1}{6.98} \quad 20.04(Q_s + 8.75) - 4.2\ Q_s - 4.425) \qquad (2)$$

The allowable 5-day CBOD, in terms of lb/day BOD_5:

$$\text{Allowable } BOD_5 = \frac{S_o}{F} \ (8.34) \ Q_D$$

$$= \frac{S_o}{4.5} \ (8.34) \ \frac{6.98}{1.547}$$

This can be substituted into equation 2 and results in:

$$\text{Allowable } CBOD_5 = \frac{8.34\ (6.98)}{4.5\ (6.98)(1.547)} \ (20.04\ (Qs + 8.75) - 4.2\ Qs - 4.425) \qquad (3)$$

This equation can be further simplified to:

$$\text{Allowable } CBOD_5 = 18.97\ Q_s + 204.77$$

These controls will comply with the SWCB anti-degradation policy and provide for the long-term water quality in the North Anna River.

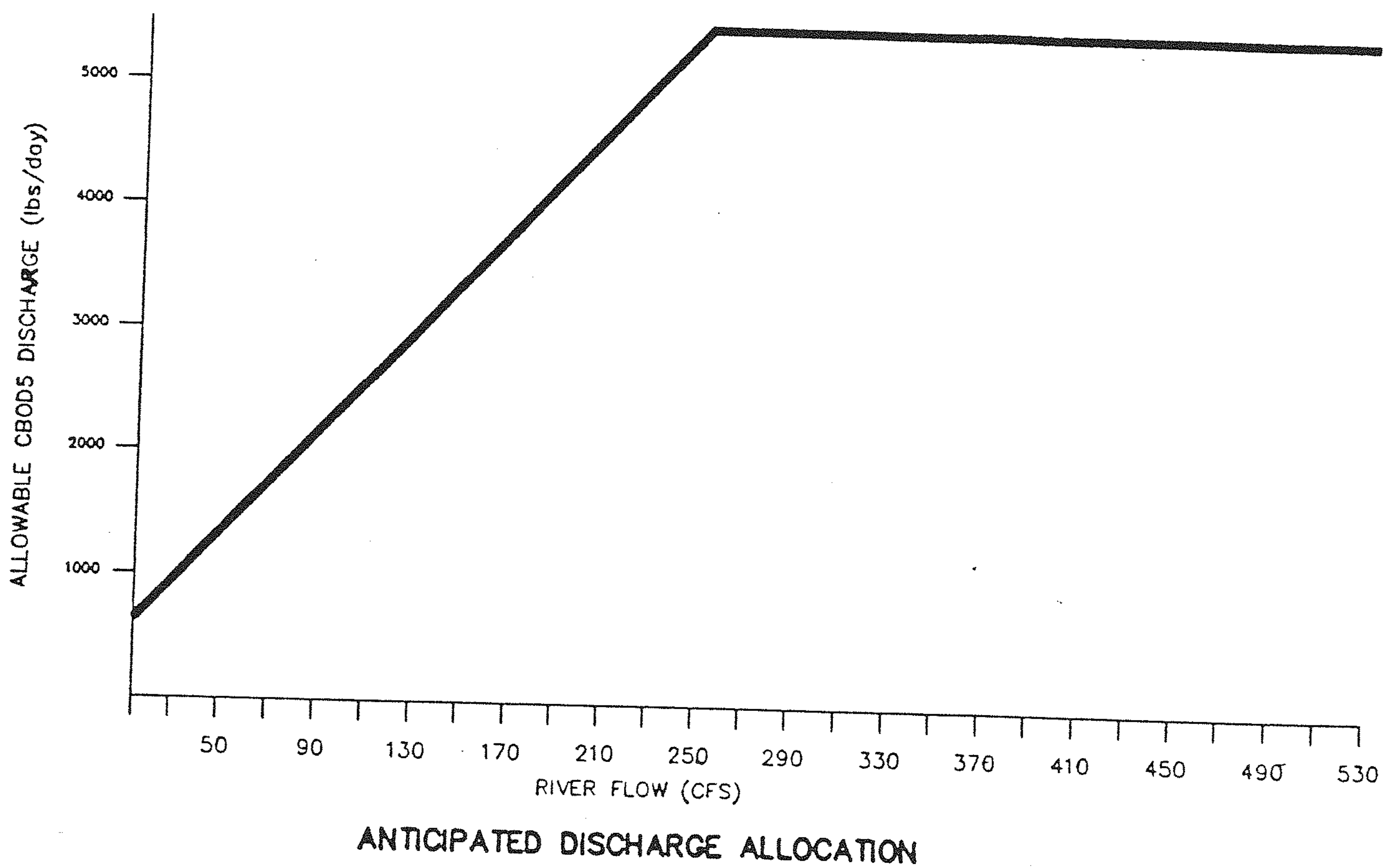


FIGURE 8-2. PROPOSED EFFLUENT CRITERIA

8.2 Oxygen Addition

The result of the modeling indicate that oxygenation of the effluent using pure oxygen will be required under low flow conditions to maintain water quality in the North Anna River. The required effluent dissolved oxygen concentrations are presented in Table 8-2. This is based on the results of the modeling presented in Table 7-2. Table 8-3 presents the North Anna River flow conditions for the various seasons where oxygen addition will not be required.

The mill uses a hydrograph-controlled release pond to store effluent under low flow conditions. With this type of storage, there are three basic discharge scenarios which can occur. These are:

1. Under normal conditions, the mill will discharge an average flow of 4.5 MGD and a maximum flow of 5.4 MGD.

2. If there are low river flow conditions, a portion of the mill effluent flow will be diverted to the hydrograph-controlled release pond.

3. If the river flow increases, then the waste stored in the hydrograph-controlled release pond will be discharged based on equation 8-2.

When there is no waste stored in the hydrograph-controlled release lagoon, the maximum discharge will be 5.4 MGD at 30 mg/l $CBOD_5$ (1,350 pounds $CBOD_5$ per day); if there is waste stored in the hydrograph-controlled-release pond, a discharge of up to 5,300 pounds $CBOD_5$ per day can occur, based on the river flow (equation 8-2).

TABLE 8-2

REQUIRED EFFLUENT DISSOLVED OXYGEN LEVEL

Season	Effluent Dissolved Oxygen[a] (mg/l)
Summer (July, August, September)	32
Fall (October, November, December)	17
Winter (January, February, March)	12
Spring (April, May, June)	27

[a] The effluent dissolved oxygen concentration is calculated through a mass balance where

DO inputs = DO mix in river

North Anna DO + Little River DO + effluent DO = DO mix in river

$$\frac{Qs\ DO_A + 1.77\ DO_B + 1.547\ Q_D\ DO_D}{Q's + 1.77 + 1.547\ Q_D} = \text{DO mix in River}$$

where

DO mix in river - from Table 7-2 (mg/l)

Qs = stream flow in North Anna after withdrawal (cfs)

DO_A = North Anna background DO, based on Table 7-2.

DO_B = Little River DO (mg/l) = DO_A

Q_D = effluent discharge flow (MGD)

DO_D = effluent DO (mg/l)

(continued)

TABLE 8-2 (continued)

REQUIRED EFFLUENT DISSOLVED OXYGEN LEVEL

For example:

at 27^{o}C $\quad DO_A = 7.73$ mg/l (from Table 7-2)

$DO_B = 7.73$ mg/l

$Q_D = 4.5$ MGD

$Q_S = 41.91 - 16.28$ (7Q10 conditions)

$= 25.63$ cfs

DO mix in river = 12.65 mg/l (from Table 7-2)

$$DO_D = \frac{(\text{DO mix in river})(Q_S + 1.77 + 1.547\ Q_D) - Q_S\ DO_A - 1.77\ DO_B}{1.547\ Q_D}$$

$$= \frac{(\ (12.65)(25.63) + 1.77 + 6.96)\ ) - (25.63)(7.73) - (1.77)(7.73)}{(1.547)(4.5)}$$

$= 32$ mg/l

TABLE 8-3

SUMMARY OF RIVER FLOWS WHERE PURE OXYGEN ADDITION IS NOT REQUIRED

Season	Minimum River Flow (cfs)	
	Mill Waste Discharge (5.4 MGD Max.)	Mill Waste Plus Hydrograph-Controlled Pond Discharge (21.2 MGD Max.)
Summer (July, August, September)	100	231
Fall (October, November, December)	89	202
Winter (January, February, March)	81	181
Spring (April, May, June)	95	224

For simplicity, it is proposed to operate on a two-season basis, summer and winter, with the summer season being April through September, and the winter season being October through March. For the summer season, the effluent dissolved concentration will be 32 mg/l, and during the winter season it will be 17 mg/l. The oxygen addition will be required under all conditions when the river flow is less than 100 cfs. Oxygen addition will not be required at river flows over 100 cfs, unless there is the need to discharge from the hydrograph-controlled release pond. If there is any discharge from the hydrograph-controlled release pond, oxygen addition will be required up to a river flow of 235 cfs.

A summary of the proposed regulations is presented in Table 8-4. These controls wil comply with the State Water Control Board anti-degradation policy and provide for the long-term water quality of the North Anna River.

TABLE 8-4

PROPOSED DISCHARGE CRITERIA

Season	Effluent DO Using Pure Oxygen Post-Oxygenation (mg/l)	Minimum River Flow to Switch to Cascade Aeration (cfs)	
		Mill Waste Discharge (5.4 MGD Max.)	Mill Waste Plus Hydrograph-Controlled Pond Discharge
Summer (April - September)	32	100	235
Winter (October - March)	17	100	235

Attachment 13B

(Begin at Item 12.)

Item 9: Figure 2 has been modified per your comments, with the future 1 MGD at the Doswell STP deleted, and with the oxygen supply valve position changed to the "closed" position, to reflect the correct operating scheme of the treatment system; and is included as Attachment 5.

Item 10: Item 10 - The daily flow rate is utilized in the equation and the daily flow rate is used to set the oxygen addition. The sentence in question should read "A set of controls, based on daily discharge flow, allows supplemental effluent oxygenation to be suspended when the river flow exceeds 100 cfs, when the existing cascade aeration system can be used instead."

Item 11: Item 11 - The note on Table 4 and Table 5 should be 6.5 mg/L and should read "NOTE: When switching to cascade aeration, effluent DO criteria is 6.5 mg/L". The narrative on Page 15 should read "At these minimum flow rates, the use of cascade aeration systems to oxygenate the effluent to a dissolved oxygen concentration of 6.5 mg/L is sufficient to maintain the required minimum DO conditions in the North Anna River."

Item 12: You are correct in noting that the Effluent Oxygenation Controls discussed on Page 15, in Table 5, in Table 6, and on Page 19 include an additional 1.0 MGD from the Doswell STP, even though, as is also stated in the Engineering Report, that plant expansion will not occur during the lifetime of the VPDES permit. One reason is that the design of the oxygenation system should take into account possible future expansion of Doswell, as it is anticipated that the oxygenation system will have an operating life longer than the five year term of this permit. The effect of operating under these conditions can best be observed by a comparison of the Effluent Oxygenation Controls with the Doswell expansion to the Effluent Oxygenation Controls without the Doswell expansion. Tables 5 and 6 from the Engineering Report, attached here for your convenience as Attachment 6, outlines the effluent oxygenation controls based on an average flow of 6.75 MGD and a maximum flow of 7.34 MGD (i.e., with the Doswell expansion). Tables 5a and 6a, also included in Attachment 6, outline the effluent oxygenation controls based on an average flow of 5.75 MGD and a maximum flow of 6.75 MGD (i.e., without the Doswell expansion).

6.311

Comparing the two operating schemes, the two operating schemes differ in the effluent oxygen required, and in the North Anna flow above which no supplemental oxygenation is required. The Doswell expansion causes the effluent oxygen requirement at 7Q10 flow to decrease slightly, from 29 mg/L to 27.19 mg/L in the summer and from 16 mg/L to 15.4 mg/L in the fall. Because the effluent DO concentrations in either case is lower than the effluent DO concentration of 32 mg/L and 17 mg/L originally listed in the original VPDES permit application, the original permit DO concentrations of 32 mg/L and 17 mg/L were maintained originally to avoid additional permit modifications. The correct limits for the new permit should be 29 mg/L summer and 16 mg/L winter. The higher effluent DO concentrations result in a higher in-stream DO concentration, which in turn results in a higher minimum DO concentration in the river, thus ensuring compliance with the State Water Control Board's antidegradation policy requiring a DO sag of no more than 0.2 mg/L below the critical DO in the North Anna and Pamunkey Rivers.

The Doswell expansion causes the minimum N. Anna flow above which no oxygenation is required to increase, from 111 to 121 cfs in summer and from 97 to 105 cfs in the fall. If BIPCO chooses to operate under the oxygenation control scheme outlined in Table 5 while the Doswell expansion does not occur, then more oxygen will be added to the North Anna River than estimated to be necessary to maintain the minimum DO concentration throughout the North Anna, which again will help ensure compliance with the State Water Control Board's antidegradation policy. If desired by the SWCB, the effluent oxygenation controls included in Table 5a can be utilized until the Doswell expansion occurs.

Several other items in this letter address the derivation of some of the parameters in Table 6. To avoid confusion, any questions in these areas will be answered only for the 6.75/7.34 MGD case presented in the Engineering Report. If the SWCB desires, comparable documentation for the 5.75/6.34 MGD case can be presented.

Item 13: The omitted footnote c in Table 6 states "River sections 7.4.1 through 7.4.4 ", which covers the sections of the North Anna that reflect the minimum DO conditions that Lines 5 and 7 in Table 6 are based on. Note that this footnote was included in the tables included in Attachment 6. These are the river sections included in Appendices B and C of the Engineering Report. The source of the information in Lines 5 and 7 is from the water quality model, via iterative runs to determine first the in-stream DO to maintain the minimum DO in the river (Line 5 of Table 6), then the North Anna flow above which no oxygenation is required (Line 7 of Table 6). Copies of the computer printouts showing the derivation of these values are attached as Attachment 7.

Attachment 14

Effluent Limitation Development for the Bear Island Expansion

Mixing Zone Predictions for Doswell WWTP expansion

Effluent Flow = 6.34 MGD
Stream 7Q10 = 29 MGD
Stream 30Q10 = 32 MGD
Stream 1Q10 = 27 MGD
Stream slope = 0.00038 ft/ft
Stream width = 75 ft
Bottom scale = 2
Channel scale = 1

Mixing Zone Predictions @ 7Q10

Depth = 1.5445 ft
Length = 5004.32 ft
Velocity = .4722 ft/sec
Residence Time = .1226 days

Recommendation:

A complete mix assumption is appropriate for this situation and the entire 7Q10 may be used.

Mixing Zone Predictions @ 30Q10

Depth = 1.6232 ft
Length = 4794.79 ft
Velocity = .4875 ft/sec
Residence Time = .1138 days

Recommendation:

A complete mix assumption is appropriate for this situation and the entire 30Q10 may be used.

Mixing Zone Predictions @ 1Q10

Depth = 1.4907 ft
Length = 5159.18 ft
Velocity = .4616 ft/sec
Residence Time = 3.1045 hours

Recommendation:

A complete mix assumption is appropriate for this situation providing no more than 32.21% of the 1Q10 is used.

Virginia DEQ Mixing Zone Analysis Version 2.1

FRESHWATER
WATER QUALITY CRITERIA / WASTELOAD ALLOCATION ANALYSIS

Facility Name: Doswell WWTP expansion   Permit No.: VA0029521

Receiving Stream: North Anna River   Version: OWP Guidance Memo 00-2011 (8/24/00)

Stream Information

Mean Hardness (as CaCO3) =	19.4	mg/L
90% Temperature (Annual) =	26.2	deg C
90% Temperature (Wet season) =		deg C
90% Maximum pH =	7.4	SU
10% Maximum pH =	6.4	SU
Tier Designation (1 or 2) =	1	
Public Water Supply (PWS) Y/N? =	n	
Trout Present Y/N? =	n	
Early Life Stages Present Y/N? =	y	

Stream Flows

1Q10 (Annual) =	27	MGD
7Q10 (Annual) =	29	MGD
30Q10 (Annual) =	32	MGD
1Q10 (Wet season) =	0	MGD
30Q10 (Wet season)	0	MGD
30Q5 =	33	MGD
Harmonic Mean =	81	MGD
Annual Average =		MGD

Mixing Information

Annual - 1Q10 Mix =	32.21	%
- 7Q10 Mix =	100	%
- 30Q10 Mix =	100	%
Wet Season - 1Q10 Mix =		%
- 30Q10 Mix =		%

Effluent Information

Mean Hardness (as CaCO3) =	562	mg/L
90% Temp (Annual) =	30.6	deg C
90% Temp (Wet season) =		deg C
90% Maximum pH =	7.9	SU
10% Maximum pH =	7.7	SU
Discharge Flow =	6.34	MGD

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Acenapthene	0	--	--	na	2.7E+03	--	--	na	1.7E+04	--	--	--	--	--	--	--	--	--	--	na	1.7E+04
Acrolein	0	--	--	na	7.8E+02	--	--	na	4.8E+03	--	--	--	--	--	--	--	--	--	--	na	4.8E+03
Acrylonitrile[C]	0	--	--	na	6.6E+00	--	--	na	9.1E+01	--	--	--	--	--	--	--	--	--	--	na	9.1E+01
Aldrin [C]	0	3.0E+00	--	na	1.4E-03	7.1E+00	--	na	1.9E-02	--	--	--	--	--	--	--	--	7.1E+00	--	na	1.9E-02
Ammonia-N (mg/l) (Yearly)	0	1.85E+01	2.04E+00	na	--	4.4E+01	1.2E+01	na	--	--	--	--	--	--	--	--	--	4.4E+01	1.2E+01	na	--
Ammonia-N (mg/l) (High Flow)	0	1.01E+01	2.80E+00	na	--	1.0E+01	2.8E+00	na	--	--	--	--	--	--	--	--	--	1.0E+01	2.8E+00	na	--
Anthracene	0	--	--	na	1.1E+05	--	--	na	6.8E+05	--	--	--	--	--	--	--	--	--	--	na	6.8E+05
Antimony	0	--	--	na	4.3E+03	--	--	na	2.7E+04	--	--	--	--	--	--	--	--	--	--	na	2.7E+04
Arsenic	0	3.4E+02	1.5E+02	na	--	8.1E+02	8.4E+02	na	--	--	--	--	--	--	--	--	--	8.1E+02	8.4E+02	na	--
Barium	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Benzene [C]	0	--	--	na	7.1E+02	--	--	na	9.8E+03	--	--	--	--	--	--	--	--	--	--	na	9.8E+03
Benzidine[C]	0	--	--	na	5.4E-03	--	--	na	7.4E-02	--	--	--	--	--	--	--	--	--	--	na	7.4E-02
Benzo (a) anthracene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Benzo (b) fluoranthene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Benzo (k) fluoranthene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Benzo (a) pyrene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Bis2-Chloroethyl Ether	0	--	--	na	1.4E+01	--	--	na	8.7E+01	--	--	--	--	--	--	--	--	--	--	na	8.7E+01
Bis2-Chloroisopropyl Ether	0	--	--	na	1.7E+05	--	--	na	1.1E+06	--	--	--	--	--	--	--	--	--	--	na	1.1E+06
Bromoform [C]	0	--	--	na	3.6E+03	--	--	na	5.0E+04	--	--	--	--	--	--	--	--	--	--	na	5.0E+04
Butylbenzylphthalate	0	--	--	na	5.2E+03	--	--	na	3.2E+04	--	--	--	--	--	--	--	--	--	--	na	3.2E+04
Cadmium	0	1.1E+01	1.3E+00	na	--	2.6E+01	7.1E+00	na	--	--	--	--	--	--	--	--	--	2.6E+01	7.1E+00	na	--
Carbon Tetrachloride [C]	0	--	--	na	4.4E+01	--	--	na	6.1E+02	--	--	--	--	--	--	--	--	--	--	na	6.1E+02
Chlordane [C]	0	2.4E+00	4.3E-03	na	2.2E-02	5.7E+00	2.4E-02	na	3.0E-01	--	--	--	--	--	--	--	--	5.7E+00	2.4E-02	na	3.0E-01
Chloride	0	8.6E+05	2.3E+05	na	--	2.0E+06	1.3E+06	na	--	--	--	--	--	--	--	--	--	2.0E+06	1.3E+06	na	--
TRC	0	1.9E+01	1.1E+01	na	--	4.5E+01	6.1E+01	na	--	--	--	--	--	--	--	--	--	4.5E+01	6.1E+01	na	--
Chlorobenzene	0	--	--	na	2.1E+04	--	--	na	1.3E+05	--	--	--	--	--	--	--	--	--	--	na	1.3E+05

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Chlorodibromomethane [C]	0	--	--	na	3.4E+02	--	--	na	4.7E+03	--	--	--	--	--	--	--	--	--	--	na	4.7E+03
Chloroform [C]	0	--	--	na	2.9E+04	--	--	na	4.0E+05	--	--	--	--	--	--	--	--	--	--	na	4.0E+05
2-Chloronaphthalene	0	--	--	na	4.3E+03	--	--	na	2.7E+04	--	--	--	--	--	--	--	--	--	--	na	2.7E+04
2-Chlorophenol	0	--	--	na	4.0E+02	--	--	na	2.5E+03	--	--	--	--	--	--	--	--	--	--	na	2.5E+03
Chlorpyrifos	0	8.3E-02	4.1E-02	na	--	2.0E-01	2.3E-01	na	--	--	--	--	--	--	--	--	--	2.0E-01	2.3E-01	na	--
Chromium III	0	1.2E+03	8.4E+01	na	--	2.8E+03	4.7E+02	na	--	--	--	--	--	--	--	--	--	2.8E+03	4.7E+02	na	--
Chromium VI	0	1.6E+01	1.1E+01	na	--	3.8E+01	6.1E+01	na	--	--	--	--	--	--	--	--	--	3.8E+01	6.1E+01	na	--
Chromium, Total	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Chrysene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Copper	0	3.2E+01	1.0E+01	na	--	7.5E+01	5.7E+01	na	--	--	--	--	--	--	--	--	--	7.5E+01	5.7E+01	na	--
Cyanide	0	2.2E+01	5.2E+00	na	2.2E+05	5.2E+01	2.9E+01	na	1.3E+06	--	--	--	--	--	--	--	--	5.2E+01	2.9E+01	na	1.3E+06
DDD [C]	0	--	--	na	8.4E-03	--	--	na	1.2E-01	--	--	--	--	--	--	--	--	--	--	na	1.2E-01
DDE [C]	0	--	--	na	5.9E-03	--	--	na	8.1E-02	--	--	--	--	--	--	--	--	--	--	na	8.1E-02
DDT [C]	0	1.1E+00	1.0E-03	na	5.9E-03	2.6E+00	5.6E-03	na	8.1E-02	--	--	--	--	--	--	--	--	2.6E+00	5.6E-03	na	8.1E-02
Demeton	0	--	1.0E-01	na	--	--	5.6E-01	na	--	--	--	--	--	--	--	--	--	--	5.6E-01	na	--
Dibenz(a,h)anthracene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Dibutyl phthalate	0	--	--	na	1.2E+04	--	--	na	7.4E+04	--	--	--	--	--	--	--	--	--	--	na	7.4E+04
Dichloromethane (Methylene Chloride) [C]	0	--	--	na	1.6E+04	--	--	na	2.2E+05	--	--	--	--	--	--	--	--	--	--	na	2.2E+05
1,2-Dichlorobenzene	0	--	--	na	1.7E+04	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
1,3-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	1.6E+04	--	--	--	--	--	--	--	--	--	--	na	1.6E+04
1,4-Dichlorobenzene	0	--	--	na	2.6E+03	--	--	na	1.6E+04	--	--	--	--	--	--	--	--	--	--	na	1.6E+04
3,3-Dichlorobenzidine [C]	0	--	--	na	7.7E-01	--	--	na	1.1E+01	--	--	--	--	--	--	--	--	--	--	na	1.1E+01
Dichlorobromomethane [C]	0	--	--	na	4.6E+02	--	--	na	6.3E+03	--	--	--	--	--	--	--	--	--	--	na	6.3E+03
1,2-Dichloroethane [C]	0	--	--	na	9.9E+02	--	--	na	1.4E+04	--	--	--	--	--	--	--	--	--	--	na	1.4E+04
1,1-Dichloroethylene	0	--	--	na	1.7E+04	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
1,2-trans-dichloroethylene	0	--	--	na	1.4E+05	--	--	na	8.7E+05	--	--	--	--	--	--	--	--	--	--	na	8.7E+05
2,4-Dichlorophenol	0	--	--	na	7.9E+02	--	--	na	4.9E+03	--	--	--	--	--	--	--	--	--	--	na	4.9E+03
2,4-Dichlorophenoxy acetic acid (2,4-D)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,2-Dichloropropane [C]	0	--	--	na	3.9E+02	--	--	na	5.4E+03	--	--	--	--	--	--	--	--	--	--	na	5.4E+03
1,3-Dichloropropene	0	--	--	na	1.7E+03	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
Dieldrin [C]	0	2.4E-01	5.6E-02	na	1.4E-03	5.7E-01	3.1E-01	na	1.9E-02	--	--	--	--	--	--	--	--	5.7E-01	3.1E-01	na	1.9E-02
Diethyl Phthalate	0	--	--	na	1.2E+05	--	--	na	7.4E+05	--	--	--	--	--	--	--	--	--	--	na	7.4E+05
Di-2-Ethylhexyl Phthalate [C]	0	--	--	na	5.9E+01	--	--	na	8.1E+02	--	--	--	--	--	--	--	--	--	--	na	8.1E+02
2,4-Dimethylphenol	0	--	--	na	2.3E+03	--	--	na	1.4E+04	--	--	--	--	--	--	--	--	--	--	na	1.4E+04
Dimethyl Phthalate	0	--	--	na	2.9E+06	--	--	na	1.8E+07	--	--	--	--	--	--	--	--	--	--	na	1.8E+07
Di-n-Butyl Phthalate	0	--	--	na	1.2E+04	--	--	na	7.4E+04	--	--	--	--	--	--	--	--	--	--	na	7.4E+04
2,4 Dinitrophenol	0	--	--	na	1.4E+04	--	--	na	8.7E+04	--	--	--	--	--	--	--	--	--	--	na	8.7E+04
2-Methyl-4,6-Dinitrophenol	0	--	--	na	7.65E+02	--	--	na	4.7E+03	--	--	--	--	--	--	--	--	--	--	na	4.7E+03
2,4-Dinitrotoluene [C]	0	--	--	na	9.1E+01	--	--	na	1.3E+03	--	--	--	--	--	--	--	--	--	--	na	1.3E+03
Dioxin (2,3,7,8-tetrachlorodibenzo-p-dioxin) (ppq)	0	--	--	na	1.2E-06	--	--	na	na	--	--	--	--	--	--	--	--	--	--	na	na
1,2-Diphenylhydrazine [C]	0	--	--	na	5.4E+00	--	--	na	7.4E+01	--	--	--	--	--	--	--	--	--	--	na	7.4E+01
Alpha-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	5.2E-01	3.1E-01	na	1.5E+03	--	--	--	--	--	--	--	--	5.2E-01	3.1E-01	na	1.5E+03
Beta-Endosulfan	0	2.2E-01	5.6E-02	na	2.4E+02	5.2E-01	3.1E-01	na	1.5E+03	--	--	--	--	--	--	--	--	5.2E-01	3.1E-01	na	1.5E+03
Endosulfan Sulfate	0	--	--	na	2.4E+02	--	--	na	1.5E+03	--	--	--	--	--	--	--	--	--	--	na	1.5E+03
Endrin	0	8.6E-02	3.6E-02	na	8.1E-01	2.0E-01	2.0E-01	na	5.0E+00	--	--	--	--	--	--	--	--	2.0E-01	2.0E-01	na	5.0E+00
Endrin Aldehyde	0	--	--	na	8.1E-01	--	--	na	5.0E+00	--	--	--	--	--	--	--	--	--	--	na	5.0E+00

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Ethylbenzene	0	--	--	na	2.9E+04	--	--	na	1.8E+05	--	--	--	--	--	--	--	--	--	--	na	1.8E+05
Fluoranthene	0	--	--	na	3.7E+02	--	--	na	2.3E+03	--	--	--	--	--	--	--	--	--	--	na	2.3E+03
Fluorene	0	--	--	na	1.4E+04	--	--	na	8.7E+04	--	--	--	--	--	--	--	--	--	--	na	8.7E+04
Foaming Agents	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Guthion	0	--	1.0E-02	na	--	--	5.6E-02	na	--	--	--	--	--	--	--	--	--	--	5.6E-02	na	--
Heptachlor [C]	0	5.2E-01	3.8E-03	na	2.1E-03	1.2E+00	2.1E-02	na	2.9E-02	--	--	--	--	--	--	--	--	1.2E+00	2.1E-02	na	2.9E-02
Heptachlor Epoxide[C]	0	5.2E-01	3.8E-03	na	1.1E-03	1.2E+00	2.1E-02	na	1.5E-02	--	--	--	--	--	--	--	--	1.2E+00	2.1E-02	na	1.5E-02
Hexachlorobenzene[C]	0	--	--	na	7.7E-03	--	--	na	1.1E-01	--	--	--	--	--	--	--	--	--	--	na	1.1E-01
Hexachlorobutadiene[C]	0	--	--	na	5.0E+02	--	--	na	6.9E+03	--	--	--	--	--	--	--	--	--	--	na	6.9E+03
Hexachlorocyclohexane Alpha-BHC[C]	0	--	--	na	1.3E-01	--	--	na	1.8E+00	--	--	--	--	--	--	--	--	--	--	na	1.8E+00
Hexachlorocyclohexane Beta-BHC[C]	0	--	--	na	4.6E-01	--	--	na	6.3E+00	--	--	--	--	--	--	--	--	--	--	na	6.3E+00
Hexachlorocyclohexane Gamma-BHC[C] (Lindane)	0	9.5E-01	na	na	6.3E-01	2.3E+00	--	na	8.7E+00	--	--	--	--	--	--	--	--	2.3E+00	--	na	8.7E+00
Hexachlorocyclopentadiene	0	--	--	na	1.7E+04	--	--	na	1.1E+05	--	--	--	--	--	--	--	--	--	--	na	1.1E+05
Hexachloroethane[C]	0	--	--	na	8.9E+01	--	--	na	1.2E+03	--	--	--	--	--	--	--	--	--	--	na	1.2E+03
Hydrogen Sulfide	0	--	2.0E+00	na	--	--	1.1E+01	na	--	--	--	--	--	--	--	--	--	--	1.1E+01	na	--
Indeno (1,2,3-cd) pyrene [C]	0	--	--	na	4.9E-01	--	--	na	6.8E+00	--	--	--	--	--	--	--	--	--	--	na	6.8E+00
Iron	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Isophorone[C]	0	--	--	na	2.6E+04	--	--	na	3.6E+05	--	--	--	--	--	--	--	--	--	--	na	3.6E+05
Kepone	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Lead	0	3.8E+02	1.6E+01	na	--	9.0E+02	9.2E+01	na	--	--	--	--	--	--	--	--	--	9.0E+02	9.2E+01	na	--
Malathion	0	--	1.0E-01	na	--	--	5.6E-01	na	--	--	--	--	--	--	--	--	--	--	5.6E-01	na	--
Manganese	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Mercury	0	1.4E+00	7.7E-01	na	5.1E-02	3.3E+00	4.3E+00	na	3.2E-01	--	--	--	--	--	--	--	--	3.3E+00	4.3E+00	na	3.2E-01
Methyl Bromide	0	--	--	na	4.0E+03	--	--	na	2.5E+04	--	--	--	--	--	--	--	--	--	--	na	2.5E+04
Methoxychlor	0	--	3.0E-02	na	--	--	1.7E-01	na	--	--	--	--	--	--	--	--	--	--	1.7E-01	na	--
Mirex	0	--	0.0E+00	na	--	--	0.0E+00	na	--	--	--	--	--	--	--	--	--	--	0.0E+00	na	--
Monochlorobenzene	0	--	--	na	2.1E+04	--	--	na	1.3E+05	--	--	--	--	--	--	--	--	--	--	na	1.3E+05
Nickel	0	3.9E+02	2.3E+01	na	4.6E+03	9.3E+02	1.3E+02	na	2.9E+04	--	--	--	--	--	--	--	--	9.3E+02	1.3E+02	na	2.9E+04
Nitrate (as N)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Nitrobenzene	0	--	--	na	1.9E+03	--	--	na	1.2E+04	--	--	--	--	--	--	--	--	--	--	na	1.2E+04
N-Nitrosodimethylamine[C]	0	--	--	na	8.1E+01	--	--	na	1.1E+03	--	--	--	--	--	--	--	--	--	--	na	1.1E+03
N-Nitrosodiphenylamine[C]	0	--	--	na	1.6E+02	--	--	na	2.2E+03	--	--	--	--	--	--	--	--	--	--	na	2.2E+03
N-Nitrosodi-n-propylamine[C]	0	--	--	na	1.4E+01	--	--	na	1.9E+02	--	--	--	--	--	--	--	--	--	--	na	1.9E+02
Parathion	0	6.5E-02	1.3E-02	na	--	1.5E-01	7.2E-02	na	--	--	--	--	--	--	--	--	--	1.5E-01	7.2E-02	na	--
PCB-1016	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB-1221	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB-1232	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB-1242	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB-1248	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB-1254	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB-1260	0	--	1.4E-02	na	--	--	7.8E-02	na	--	--	--	--	--	--	--	--	--	--	7.8E-02	na	--
PCB Total[C]	0	--	--	na	1.7E-03	--	--	na	2.3E-02	--	--	--	--	--	--	--	--	--	--	na	2.3E-02

Parameter	Background	Water Quality Criteria				Wasteload Allocations				Antidegradation Baseline				Antidegradation Allocations				Most Limiting Allocations			
(ug/l unless noted)	Conc.	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH	Acute	Chronic	HH (PWS)	HH
Pentachlorophenol C	0	6.0E+00	4.0E+00	na	8.2E+01	1.4E+01	2.2E+01	na	1.1E+03	--	--	--	--	--	--	--	--	1.4E+01	2.2E+01	na	1.1E+03
Phenol	0	--	--	na	4.6E+06	--	--	na	2.9E+07	--	--	--	--	--	--	--	--	--	--	na	2.9E+07
Pyrene	0	--	--	na	1.1E+04	--	--	na	6.8E+04	--	--	--	--	--	--	--	--	--	--	na	6.8E+04
Radionuclides (pCi/l except Beta/Photon)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Gross Alpha Activity	0	--	--	na	1.5E+01	--	--	na	9.3E+01	--	--	--	--	--	--	--	--	--	--	na	9.3E+01
Beta and Photon Activity (mrem/yr)	0	--	--	na	4.0E+00	--	--	na	2.5E+01	--	--	--	--	--	--	--	--	--	--	na	2.5E+01
Strontium-90	0	--	--	na	8.0E+00	--	--	na	5.0E+01	--	--	--	--	--	--	--	--	--	--	na	5.0E+01
Tritium	0	--	--	na	2.0E+04	--	--	na	1.2E+05	--	--	--	--	--	--	--	--	--	--	na	1.2E+05
Selenium	0	2.0E+01	5.0E+00	na	1.1E+04	4.7E+01	2.8E+01	na	6.8E+04	--	--	--	--	--	--	--	--	4.7E+01	2.8E+01	na	6.8E+04
Silver	0	1.6E+01	--	na	--	3.9E+01	--	na	--	--	--	--	--	--	--	--	--	3.9E+01	--	na	--
Sulfate	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
1,1,2,2-Tetrachloroethane C	0	--	--	na	1.1E+02	--	--	na	1.5E+03	--	--	--	--	--	--	--	--	--	--	na	1.5E+03
Tetrachloroethylene C	0	--	--	na	8.9E+01	--	--	na	1.2E+03	--	--	--	--	--	--	--	--	--	--	na	1.2E+03
Thallium	0	--	--	na	6.3E+00	--	--	na	3.9E+01	--	--	--	--	--	--	--	--	--	--	na	3.9E+01
Toluene	0	--	--	na	2.0E+05	--	--	na	1.2E+06	--	--	--	--	--	--	--	--	--	--	na	1.2E+06
Total dissolved solids	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Toxaphene C	0	7.3E-01	2.0E-04	na	7.5E-03	1.7E+00	1.1E-03	na	1.0E-01	--	--	--	--	--	--	--	--	1.7E+00	1.1E-03	na	1.0E-01
Tributyltin	0	4.6E-01	6.3E-02	na	--	1.1E+00	3.5E-01	na	--	--	--	--	--	--	--	--	--	1.1E+00	3.5E-01	na	--
1,2,4-Trichlorobenzene	0	--	--	na	9.4E+02	--	--	na	5.8E+03	--	--	--	--	--	--	--	--	--	--	na	5.8E+03
1,1,2-Trichloroethane C	0	--	--	na	4.2E+02	--	--	na	5.8E+03	--	--	--	--	--	--	--	--	--	--	na	5.8E+03
Trichloroethylene C	0	--	--	na	8.1E+02	--	--	na	1.1E+04	--	--	--	--	--	--	--	--	--	--	na	1.1E+04
2,4,6-Trichlorophenol C	0	--	--	na	6.5E+01	--	--	na	9.0E+02	--	--	--	--	--	--	--	--	--	--	na	9.0E+02
2-(2,4,5-Trichlorophenoxy) propionic acid (Silvex)	0	--	--	na	--	--	--	na	--	--	--	--	--	--	--	--	--	--	--	na	--
Vinyl Chloride C	0	--	--	na	6.1E+01	--	--	na	8.4E+02	--	--	--	--	--	--	--	--	--	--	na	8.4E+02
Zinc	0	2.5E+02	1.3E+02	na	6.9E+04	6.0E+02	7.5E+02	na	4.3E+05	--	--	--	--	--	--	--	--	6.0E+02	7.5E+02	na	4.3E+05

Notes:

1. All concentrations expressed as micrograms/liter (ug/l), unless noted otherwise
2. Discharge flow is highest monthly average or Form 2C maximum for Industries and design flow for Municipals
3. Metals measured as Dissolved, unless specified otherwise
4. "C" indicates a carcinogenic parameter
5. Regular WLAs are mass balances (minus background concentration) using the % of stream flow entered above under Mixing Information. Antidegradation WLAs are based upon a complete mix.
6. Antideg. Baseline = (0.25(WQC - background conc.) + background conc.) for acute and chronic
   = (0.1(WQC - background conc.) + background conc.) for human health
7. WLAs established at the following stream flows: 1Q10 for Acute, 30Q10 for Chronic Ammonia, 7Q10 for Other Chronic, 30Q5 for Non-carcinogens, Harmonic Mean for Carcinogens, and Annual Average for Dioxin. Mixing ratios may be substituted for stream flows where appropriate.

Metal	Target Value (SSTV)
Antimony	2.7E+04
Arsenic	3.2E+02
Barium	na
Cadmium	4.3E+00
Chromium III	2.8E+02
Chromium VI	1.5E+01
Copper	3.0E+01
Iron	na
Lead	5.5E+01
Manganese	na
Mercury	3.2E-01
Nickel	7.7E+01
Selenium	1.7E+01
Silver	1.6E+01
Zinc	2.4E+02

Note: do not use QL's lower than the minimum QL's provided in agency guidance

Facility = Doswell WWTP expansion
Chemical = Ammonia
Chronic averaging period = 30
WLAa = 44
WLAc = 12
Q.L. = .2
# samples/mo. = 30
# samples/wk. = 8

Summary of Statistics:

observations = 1
Expected Value = 6
Variance = 12.96
C.V. = 0.6
97th percentile daily values = 14.6005
97th percentile 4 day average = 9.98274
97th percentile 30 day average = 7.23631
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

6

Guidance Memorandum No. 00-2011 directs that an ammonia effluent concentration of 9 mg/L be used to evaluate the need for an ammonia limitation for a <u>municipal</u> discharge. Although this discharge consists predominantly of <u>industrial</u> wastewater, it is reasonable to check to see if the cited guidance would result in a limitation. In this case, the permit already limits TKN to 10 mg/L. Ammonia typically makes up 40% to 60% of the TKN in a <u>municipal</u> effluent. Ammonia makes up 46% of the TKN in the Bear Island wastewater (see "Outfall 001 – Supplement to Table I"). Using 60% as a worse case scenario, the ammonia concentration could be as high 6.0 mg/L, which is the concentration used in the above analysis (10 x 0.6 = 6). The above result that "no limit is required" establishes that the TKN limitation is also protective of the ammonia water quality standard. Note that the number of samples per month used in the above analysis matches the frequency of BOD monitoring.

Facility = Doswell WWTP expansion
Chemical = Chloride
Chronic averaging period = 4
WLAa = 2000000
WLAc = 1300000
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 29000
Variance = 3027600
C.V. = 0.6
97th percentile daily values = 70569.1
97th percentile 4 day average = 48249.9
97th percentile 30 day average = 34975.5
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

29000

Facility = Doswell WWTP expansion
Chemical = Total Residual Chlorine
Chronic averaging period = 4
WLAa = 45
WLAc = 61

Q.L. = 0.1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 3
Expected Value = 360
Variance = 46656
C.V. = 0.6
97th percentile daily values = 876.030
97th percentile 4 day average = 598.964
97th percentile 30 day average = 434.179
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

A limit is needed based on Acute Toxicity

Maximum Daily Limit = 45
Average Weekly Limit = 45
Average Monthly Limit = 45

The data are:

190
410
480

Chlorine is not used for disinfection at the Doswell treatment plant and chlorine is not used in the Bear Island process. The above concentrations were determined in conjunction with the failed *Ceriodaphnia dubia* chronic bioassay test in March 2007 (see Attachment 8). These TRC concentrations are believed to be false positives due to possible interference by manganese or alkalinity. Because chlorine is not used at either site, limitations are not included in the draft permit. (It is not appropriate to "force" chlorine limitations with an input of value of 20,000 µg/L per Guidance Memorandum No. 00-2011 because chlorine is not added to the system at any point.)

Facility = Doswell WWTP expansion
Chemical = Dissolved Copper
Chronic averaging period = 4
WLAa = 75
WLAc = 57
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 6
Variance = 12.96
C.V. = 0.6
97th percentile daily values = 14.6005
97th percentile 4 day average = 9.98274
97th percentile 30 day average = 7.23631
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

6

The dissolved copper data reported with the permit renewal application were 6 µg/L, <5 µg/L, and <5 µg/L (see Attachment 6A). In accordance with a memorandum dated January 29, 2003 from Allan Brockenbrough regarding mixed data sets that include censored data (values reported as less than a quantification limit (QL)) and uncensored data (>QL; i.e., a real number), the reasonable potential analysis is initially done using only the uncensored data. If limitations are not indicated, then the analysis is complete. That is the case with the copper data.

Facility = Doswell WWTP expansion
Chemical = Cyanide
Chronic averaging period = 4
WLAa = 52
WLAc = 29
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 2
Expected Value = 10.5
Variance = 39.69
C.V. = 0.6
97th percentile daily values = 25.5508
97th percentile 4 day average = 17.4697
97th percentile 30 day average = 12.6635
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

11
10

The cyanide data reported with the permit renewal application were 11 µg/L, 10 µg/L, and <10 µg/L (see Attachment 6A). In accordance with a memorandum dated January 29, 2003 from Allan Brockenbrough regarding mixed data sets that include censored data (values reported as less than a quantification limit (QL)) and uncensored data (>QL; i.e., a real number), the reasonable potential analysis is initially done using only the uncensored data. If limitations are not indicated, then the analysis is complete. That is the case with the cyanide data. Note in Attachment 6A that a cyanide study was conducted starting in March 2004 and ending in October 2005. The above data are consistent with the data collected during that study period. Although the data from the cyanide study are more than three years old, they are still representative and could have been included in the above analysis. The above analysis using only two data points is a more extreme analysis however, which indicates that limitations are not needed.

Facility = Doswell WWTP expansion
Chemical = Dissolved Lead
Chronic averaging period = 4
WLAa = 900
WLAc = 92
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 1
Expected Value = 30
Variance = 324
C.V. = 0.6
97th percentile daily values = 73.0025
97th percentile 4 day average = 49.9137
97th percentile 30 day average = 36.1815
< Q.L. = 0
Model used = BPJ Assumptions, type 2 data

No Limit is required for this material

The data are:

30

The dissolved lead data reported with the permit renewal application were (all in µg/L): <20, <20, 30, <20, <20, <20, <20, <20, <20, and <20 (see Attachment 6A). In accordance with a memorandum dated January 29, 2003 from Allan Brockenbrough regarding mixed data sets that include censored data (values reported as less than a quantification limit (QL)) and uncensored data (>QL; i.e., a real number), the reasonable potential analysis is initially done using only the uncensored data. If limitations are not indicated, then the analysis is complete. That is the case with the lead data.

Facility = Doswell WWTP expansion
Chemical = Dissolved Zinc
Chronic averaging period = 4
WLAa = 600
WLAc = 750
Q.L. = 1
# samples/mo. = 1
# samples/wk. = 1

Summary of Statistics:

observations = 11
Expected Value = 133.937
Variance = 1605.77
C.V. = 0.299185
97th percentile daily values = 222.573
97th percentile 4 day average = 175.236
97th percentile 30 day average = 147.698
< Q.L. = 0
Model used = lognormal

No Limit is required for this material

The data are:

108
101
134
218
173
98
113
110
104
109
204

Attachment 15

Comments Received during Public Comment Period and DEQ Response

MEMORANDUM
DEPARTMENT OF ENVIRONMENTAL QUALITY

SUBJECT: Dispensation of a Request for a Public Hearing
VPDES Permit No. VA0029521, Doswell Wastewater Treatment Plant (WWTP)
Hanover County

TO: Michael Murphy, Piedmont Regional Office Director

FROM: Curt Linderman, Water Permit Manager CRL

DATE: January 31, 2013

COPIES: Kyle Winter, Ray Jenkins, Melanie Davenport, Fred Cunningham

Background

The Doswell Wastewater Treatment Plant (WWTP) is owned and operated by Hanover County (the "permittee") and is located at 15468 Theme Park Way, Doswell VA. The facility discharges a combined effluent of municipal sewage from the Hanover County collection system and industrial effluent from Bear Island Paper WB, LLC (Bear Island). The discharge is authorized by Virginia Pollutant Discharge Elimination System (VPDES) permit number VA0029521 issued to Hanover County, and is classified as a major municipal permit and Chesapeake Bay Significant Discharger.

The Doswell WWTP initiated operations in 1975 with a sewerage treatment capacity of 1.0 million gallons per day (MGD). The Bear Island Mill commenced operations producing newsprint using a thermo-mechanical pulping process in 1979. The Bear Island Mill industrial effluent receives treatment at a wastewater treatment works that is separate from the Doswell WWTP, but discharges to the North Anna River via a shared outfall with the Doswell WWTP. In response to the combined discharge, DEQ has required the County and Bear Island to enter into a Sewer Agreement with each other, in which the County is the VPDES permit holder, and is held responsible for Bear Island's wastewater discharge. Wastewater is discharged to the North Anna River at the confluence of the Little River downstream of Lake Anna. Releases from Lake Anna are subject to the provisions of a Lake Level Contingency Plan in accordance with *Code of Virginia*, §62.1-44.15:1.2.

VPDES permit VA0029521 has historically controlled conventional pollutants through the use of a "control" equation, which allows the authorized wastewater loads of the combined discharge to fluctuate in proportion to ambient stream flow conditions. The original design flow of the Bear Island plant was 1.5 MGD, but the Mill's plant has subsequently undergone multiple upgrades and re-ratings to a current design capacity of 4.2 MGD. The current combined treatment capacity of both the Doswell domestic sewage and Bear Island Mill plants is 5.2 MGD.

VPDES permit VA0029521 was last re-issued, effective May 19, 2003. A complete application for re-issuance was received April 4, 2008, and the permit has been administratively continued since May 18, 2008. The re-issuance application includes a proposal for a Bear Island Mill expansion that would increase the combined VA0029521 design flow to 5.75 MGD. The proposed draft permit includes effluent limitations for both current conditions, and the Mill expansion. The draft permit also includes a special condition (Part I.B.30) outlining the intent for an updated watershed water quality model for conventional pollutants to be undertaken during the upcoming permit term.

The Need for an Updated Water Quality Model

The VPDES permit currently limits the combined effluent by use of a "control" equation that was derived by the DEQ in 1978. In addition, the York River Basin Water Quality Management Plan limits the Doswell WWTP's discharge to 690 lbs/day of $cBOD_5$. The discharge has been addressed by several later modeling reports, including a 1988 model of the North Anna and Pamunkey Rivers by HDR Infrastructure, a 1995 regional model for the Pamunkey River by Black & Veatch, and a 1999 Conceptual Engineering Report in support of Bear Island Paper Company LLC by AWARE Environmental. Each of these previous modeling efforts (1978, 1988, 1995, and 1999) incorporated a total discharge flow that is different than the proposed 5.75 MGD authorized flows. Consequently, water quality model results do not currently exist representing the combined authorized 5.75 MGD discharge flows addressed by the proposed permit.

The historical modeling efforts have been additionally found to be in need of update to, among several factors: a) reflect current ambient and effluent conditions (including recent legislative Lake Contingency Plan and North Anna Lake Minimum Instream Flow policies, the effects of a heated Bear Island discharge on seasonal mixed ambient temperatures, etc.); b) address issues regarding the application of anti-degradation policies; c) to reconcile the 1988 HDR report conclusions stating that supersaturated effluent oxygenation may be needed to protect water quality when North Anna instream flows were at levels greater than 7Q10 low flows; and d) to reconcile the 1995 Black & Veatch report conclusions indicating that anticipated dissolved oxygen violations would be expected under design conditions in the Pamunkey River due to the contributing BOD loadings from the Ashland (VA0024899) and Doswell WWTPs. In addition, water quality modeling efforts performed by DEQ in 2010 for the Hanover County Courthouse STP (VA0062154) indicate a potential upstream contributing influence from the Doswell WWTP that extends beyond the historical modeled segments. Consequently, there is a need for the model to be updated to extend the length of modeled segments to full dissolved oxygen (DO) sag recovery for each of the included discharges.

An updated water quality model is also warranted to a) evaluate the continued need for the "control" equation, and the ability of the Doswell WWTP permit to conform with current DEQ guidance that limits permits to a maximum of two ambient stream flow tiers for effluent limitation development purposes, and b) to assess the municipal and Bear Island effluents as two separate permitted discharges. The Environmental Protection Agency (EPA) Region III has expressed the need for industrial effluents (such as Bear Island's) that share an outfall, but do not send their industrial wastewaters to the head works of a municipal treatment system, to secure their own separate individual permit coverage. Prior to undertaking such a step, an updated water quality model would be necessary to establish the respective effluent waste load allocations between Bear Island and the municipal plant.

This special condition establishes DEQ's intent to have the water quality model of the Doswell WWTP updated during the term of this permit. As written, the special condition does not require the permittee to undertake development of an updated water quality model. Rather, the special condition provides the permittee an opportunity to voluntarily take the lead in re-modeling efforts. Alternatively, if the permittee does not pursue or complete an approved re-modeling effort, then DEQ will develop the modeling analyses to be applied in the subsequent reissued permit cycle. This may include, but is not limited to, utilization of the DEQ Regional Water Quality Model for Free Flowing Streams.

The modeling schedule is intended to facilitate regulatory modification of the $cBOD_5$ waste load allocation in the York River Basin Water Quality Management Plan (9VAC25-720-120), to incorporate a) final model results if they support a different $cBOD_5$ WLA value; and b) to establish a line item waste load allocation for Bear Island.

Public Notice
Public notice of the draft VPDES permit was published in the *Richmond Times-Dispatch.* The public comment period began on October 16, 2012 and ended at 11:59 p.m. on November 15, 2012.

Public Comments
During the 30-day public comment period, two written comments were received by DEQ staff: 1) from Steven P. Herzog, Director of the Hanover County Department of Public Utilities by letter dated October 18, 2012; and 2) from Wayne Griffin, Mill Manager of Bear Island Paper WB, LLC by letter dated October 22, 2012. The focus of both comments was the water quality modeling provisions of proposed special condition Part I.B.30. Mr. Herzog requested the special condition be modified to address their comments, or removed from

the permit. Mr. Griffin expressed objection to the inclusion of proposed condition 30, and requested a public hearing if condition 30 was not removed.

Both comments were evaluated by staff and determined to be in full compliance with the information requirements outlined in 9VAC25-230-40 of Procedural Rule No. 1.

Summary of Comments Received during the Public Notice period, and DEQ Staff Responses

- Issue #1 (Steven Herzog, Wayne Griffin): ***Instream flows used for permitting and modeling purposes should not be reduced as a direct result of changes in Lake Level Contingency Plan (LLCP) release rates at the Lake Anna dam.***

  Staff response: The historic minimum downstream release rate established in Dominion Virginia Power's State Corporation Commission license is 40 cubic feet per second (cfs). Lake Level Contingency Plans of the State Water Control Law (§62.1-44.15:1.2) controls flow during drought condition and states in part, "*The reduction in release amounts required by a lake level contingency plan shall not be implemented to the extent they result in an adverse impact to (i) the ability to meet water quality standards based upon permitted discharge amounts...*" DEQ staff concurs that, for statistical low flow probability calculation for water quality modeling purposes under the proposed permit, mean daily stream flows are to be artificially increased to offset actual Lake Anna release rates below 40 cfs that occur as a result of LLCP implementation. This artificial increase to mean daily stream flows will be documented in a North Anna River flow frequency memorandum.

- Issue #2 (Steven Herzog, Wayne Griffin): ***An existing industry should not be required to conduct new water quality modeling under current operations. Bear Island has not been informed of other cases where this has been required***.

  Staff response: As noted on pages 13 and 14 of the proposed Fact Sheet, historical modeling efforts have been found to be in need of update to: a) reflect current ambient and effluent conditions; b) address issues regarding the application of agency anti-degradation policies; c) reconcile the 1988 HDR report conclusion stating that supersaturated effluent oxygenation may be needed to protect water quality when the North Anna River stream flows are at levels greater than 7Q10; and d) reconcile the 1995 Black & Veatch report conclusion indicating that anticipated dissolved oxygen violations would be expected under design conditions in the Pamunkey River due to biochemical oxygen demand loadings from the Doswell and Ashland wastewater treatment plants. In addition, DEQ statistical low flow frequency implementation protocols (January 1993) state that water quality models should be re-developed based on new flow frequency data, and should be run downstream until recovery, even if water quality is not contravened.

  Other cases exist within Virginia where updated water quality modeling was performed for an existing facility. Recently, MillerCoors Brewing Company (Rockingham County) submitted an approvable revised stream sanitation model in order to update its historical analysis. This submittal was required via permit special condition, and the revised modeling results were used to reconfirm compliance with the in-stream water quality standards while reflecting current ambient and effluent conditions. In addition, the Opequon Water Reclamation Facility (Frederick County) recently submitted an approvable revised stream sanitation model in order to further verify compliance with the in-stream water quality standards. This facility's re-modeling effort was also required via permit special condition, and the re-modeling results accounted for current ambient and effluent conditions.

- Issue #3 Comment (Wayne Griffin): ***DEQ should not use a desktop model to develop effluent limits if Bear Island and the County do not prepare their own water quality model. The DEQ model is very simple and extremely conservative, and will yield more stringent effluent limitations than a properly calibrated and verified model.***

Staff response: As noted on page 14 of the proposed Fact Sheet, DEQ may choose to utilize its Regional Water Quality Model for Free Flowing Streams (i.e. its DEQ desktop model) if the permittee does not pursue or complete re-modeling efforts. DEQ recognizes that other modeling platforms may be capable of performing this evaluation and the proposed condition does not preclude DEQ from considering other modeling platforms if DEQ modeling efforts are necessary.

- Issue #4 (Wayne Griffin): ***DEQ has taken the mistaken position that the anti-degradation policy for dissolved oxygen (DO) concentrations applies to the entire North Anna-South Anna-Pamunkey River system. Based on the 1973 hand-calculations by a State Water Control Board staff engineer, and 1976 York River Basin Water Quality Management Plan documentation, the South Anna and Pamunkey Rivers below the confluence with the North Anna River should not have been eligible for anti-degradation classification.***

  Staff response: The State Water Control Board's Water Quality Standards includes an anti-degradation policy (9VAC 25-20-30) where all State waters are provided one of three levels of anti-degradation protection. DEQ staff considers this comment to relate to the determination of which of those three levels, or Tiers, are applicable to this case. Tier 2 waters have water quality that is better than the water quality standards. The evaluation includes analyses of historical assessments as well as expected conditions based on permit design criteria. The Doswell VPDES permit has historically designated the receiving stream as Tier 2 waters. The referenced exhibits attached to Mr. Griffin's comments were found to show changes in the dissolved oxygen (DO) profile downstream of the discharge, but the magnitude of the modeled changes do not appear to fall to a level that is at, or below, the minimum dissolved oxygen numeric water quality criterion to warrant a change in Tier designation based on those particular exhibits. While DEQ staff believes the Tier 2 designation remains currently applicable, staff will further evaluate this issue as more details become available as part of the water quality remodeling effort. DEQ will also evaluate any additional documentation Bear Island may provide supporting historic stream conditions.

- Issue #5 (Steven Herzog, Wayne Griffin): ***Bear Island should not be required to have a separate discharge permit, and should not be required to model a combined discharge as separate discharges***.

  Staff response: In November 2007, Bear Island Paper Company and the DEQ entered into a Settlement Agreement in response to the *Bear Island Paper Company v. Commonwealth of Virginia, et al.* court proceeding. The court case was associated with nutrient waste load allocations established in the General VPDES Watershed Permit Regulation for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Bay Watershed in Virginia (9VAC 25-820-10 *et seq.*). Item #7 of the Settlement Agreement states that if Bear Island installs treatment technology for the control of nitrogen or phosphorus, whether by new construction, expansion, or upgrade to its wastewater treatment plant, that Bear Island agrees to apply for and be subject to an individual VPDES permit with concentration limits as required by 9VAC25-40-70, Regulation for Nutrient Enriched Waters and Dischargers Within the Chesapeake Bay Watershed. The proposed permit includes a proposal for a Mill expansion to a combined discharge design flow rate of 5.75 MGD. Should a Mill expansion trigger the need for a separate permit in accordance with the intent of the Settlement Agreement, modeling will be needed to establish appropriate effluent limits for separate discharges.

  In addition, EPA Region III staff have indicated a need for industrial effluents (such as Bear Island's) that share an outfall, but do not send their industrial wastewaters to the head works of a municipal treatment system, to secure their own separate individual permit coverage. In order to evaluate the potential permit implications of separate permit coverage, DEQ staff believes that limited resources would be most effectively and efficiently utilized if such analyses were to occur concurrently with the development of an updated watershed water quality model. As written, special condition Part I.C.30 does not require the permittee (or Bear Island, on the permittee's behalf) to undertake the development of an updated water quality model. Rather, the special condition provides the permittee an opportunity to voluntarily take the lead in re-modeling efforts.

- Issue #6 (Steven Herzog, Wayne Griffin): ***The continued use of a "control" equation should be allowed. Bear Island has not been informed of any law or regulation that would require elimination of the control equation in favor of seasonal tiers.***
  Staff response: This issue is not relevant to the proposed permit action, as the proposed permit does not eliminate the "control" equation.

Criteria for Dispensing of Requests for Public Hearing

The process for dispensing of requests for VPDES public hearings is addressed by §62.1-44.15:02.C of the *Code of Virginia* and by 9VAC 25-230, "Procedural Rule No. 1." Requests for public hearing are to be reviewed, and a decision made whether to hold a public hearing within 30 days following the close of the public comment period, unless the permittee or applicant agrees to a later date. On November 20, 2012, via email from Mr. Herzog to Michael P. Murphy, DEQ Piedmont Regional Office Director, an extension was approved by Hanover County (as the permittee/applicant) through January 11, 2013 to facilitate further evaluation of Issue #1. On January 9, 2013, Hanover County agreed to a further extension until January 31, 2013.

§62.1-44.15:02.C of the *Code of Virginia* and 9VAC25-230-50.A of Procedural Rule No. 1 states that for a public hearing to be granted: a) there must be significant public interest; b) the requestors raise substantial, disputed issues relevant to the issuance of the permit in question; and c) the action requested is not on its face inconsistent with, or in violation of, the State Water Control Law, federal law or any regulation promulgated thereunder. §62.1-44.15:02.C.1 of the *Code* further defines significant public interest as evidenced by the receipt of a minimum of 25 individual requests for public hearing or Board consideration.

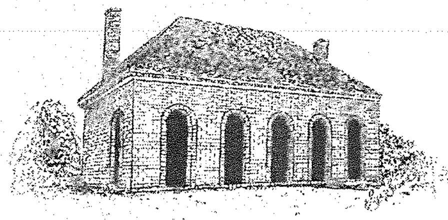
Alternatively, §62.1-44.15:02.F of the *Code of Virginia* allows the DEQ Director, in his discretion, to convene a public hearing on a permit action or submit a permit action to the State Water Control Board for its consideration.

STAFF RECOMMENDATIONS

Staff finds the number of individual requests for public hearing received does not meet the statutory requirements of significant public interest to qualify for convening a public hearing for the VPDES reissuance of permit VA0029521, Doswell WWTP. In addition, DEQ staff finds the proposed VPDES discharge permit VA0029521 to have been prepared in accordance with all applicable statutes, regulations and agency practices; the effluent limits and conditions in the permit have been adequately established to protect in-stream beneficial uses, fish and wildlife resources, and to maintain all applicable water quality standards; and all public comments relevant to the permit have been considered. Accordingly, the need for the Director to convene a public hearing at his own discretion is not warranted. It is recommended the reissuance of VPDES permit VA0029521 be approved as public noticed.

APPROVED: Mark P. M
Michael P. Murphy, Piedmont Regional Director

1-31-2013
Date



HANOVER COURTHOUSE

HANOVER COUNTY

ESTABLISHED IN 1720

DEPARTMENT OF PUBLIC UTILITIES

STEVEN P. HERZOG, P.E., DIRECTOR

GARY A. CRAFT, P.E., DEPUTY DIRECTOR

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FRANK W. HARKSEN, JR.
DEPUTY COUNTY ADMINISTRATOR

October 18, 2012

Mr. Ray Jenkins
Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, Virginia 23060

**SUBJECT: Doswell Wastewater Treatment Plant Draft Permit
VPDES Permit VA0029521**

Dear Mr. Jenkins:

Hanover County appreciates the opportunity to comment on the draft VPDES permit for our Doswell Wastewater Treatment. Hanover generally supports the permit as drafted but, as we have discussed, still has concerns about Special Condition 30 which are outlined below.

Concerning the need for a new model, the fact sheet states "*The historical modeling efforts have been found to be in need of update to, among several factors: a) reflect current ambient and effluent conditions (including recent legislative Lake Contingency Plan and North Anna Lake Minimum Instream Flow policies, …*". As you are aware, Hanover's position has consistently been that the recent legislative Lake Contingency Plan and North Anna Lake Minimum Instream Flow policies have no impact on the 7Q10 flows utilized for permitting purposes as flows can be increased, if required, to protect water quality. If Hanover is being required to remodel its discharge due to reduced releases, we are being adversely impacted and the DEQ should never allow releases of less than 40 cfs from Dominion Power's Lake Anna Facility. We continue to believe that the use of a "synthetic" 7Q10 for permitting and modeling purposes is appropriate and would address this concern.

Concerning the need for a new model, the DEQ recommended and the State Water Control Board recently approved a VWP permit for Dominion Power's Lake Anna Facility allowing for reduced discharges from the Lake Anna Facility which is upstream from Hanover's Doswell Wastewater Treatment Plant. Releases from the Lake Anna Facility directly impact in-stream flows at our discharge. To issue this permit the State

Water Control Board had to make a finding that "*instream flows for purposes of maintenance of waste assimilation capacity, domestic water supplies, commercial uses and industrial uses while protecting downstream water quality*" would be preserved. We find it incongruous that this finding could be made and just a short while later we would be asked to undertake an effort to remodel the discharge which has been in operation for more than 30 years.

Concerning the requirement to model our combined discharge as separate discharges, we see no reason for this requirement. Hanover County and Bear Island Paper Company have shared this permit and operated cooperatively together for years to meet permit limits and protect the environment. There are economies of scale and benefits to both Hanover and Bear Island Paper Company that sharing a discharge provides while protecting the environment.

Concerning the requirement that any model establish no more than two tiers, the existing control equation has been used successfully for years. We prefer to continue with the use of a control equation.

In summary Hanover requests that condition 30 be modified significantly to address our comments or be removed from the permit.

Thank you for the opportunity to comment on the draft permit. We appreciate DEQ's continued consideration of Hanover's concerns. Please feel free to contact me at (804)365-6022 if there are any questions or if I can be of any assistance.

Sincerely,

Steven P. Herzog, P.E.
Director
Department of Public Utilities

cc: Frank W. Harksen, Deputy County Administrator
Sterling Rives, County Attorney
Dave Van Gelder, Chief of Operations and Maintenance
Wayne Griffin, General Manager, White Birch Paper Company

BEAR ISLAND

October 22, 2012

BY HAND AND
FIRST-CLASS MAIL

Michael P. Murphy, Director
Piedmont Regional Office
Virginia Department of Environmental Quality
4949-A Cox Road
Glen Allen Virginia 23060

Re: VPDES Permit Number VA0029521
Doswell Wastewater Treatment Plant

Dear Mr. Murphy:

These are the comments of Bear Island Paper WB, LLC ("Bear Island"), whose wastewater treatment plant and discharge are regulated under the subject VPDES Permit (the "Permit"). Bear Island objects to the addition of the proposed Condition 30 to the Permit because of the drastic effects it would have on the operations of its paper mill. Bear Island has no other comments on the draft Permit and asks that the Permit be reissued without Condition 30.

Bear Island Paper Mill. The Bear Island Paper Mill (the "Mill") produces 660 tons of newsprint per day. In February 2010, the former owner of the Mill declared bankruptcy. Bear Island Paper WB, LLC has emerged, as of September 13, 2012, as the new owner of the Mill.

History of Bear Island's Operations. The Bear Island Mill has been in continuous operation since 1979. The Mill site was chosen for its proximity to electric power, water and Eastern U.S. newsprint markets. Lake Anna had recently been filled and the downstream River users were promised a minimum release of 40 cfs from the Lake. This was a formal promise, embodied in an order of the State Corporation Commission which was affirmed on appeal by the Virginia Supreme Court.[1] The order states:

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[1] Va. State Corporation Commission Order of June 12, 1969, O.B. 58, p. 353, Annual Rep't of State Corporation Comm'n (1969-70), at 98, aff'd *Vaughan v. Virginia Electric and Power Company*, 211 Va. 500, 178 S.E.2d 682 (1971). This Order authorized construction of the Lake Anna Dam. *See also* Op. Va. Att'y Gen. (1970-71), holding that the State Water Control Board's later unilateral attempt to impose a much higher minimum release rate (60 cfs) was not allowed. These documents are attached as Exhibit A hereto.

(1) The licensee [VEPCo] shall at all times discharge a flow of water through the dam for low flow augmentation in the amount of at least forty cubic feet per second (40 cfs).

Bear Island's 1978 application to build the Mill was controversial because Virginia paper mills had a bad reputation, due to malodors and water pollution problems. Addressing this concern, the State Water Control Board put the Mill's wastewater discharge under Hanover's control. The Permit, governing both operations, imposed the following requirements:

- The combined Doswell and Mill discharge is required to meet strict water quality requirements;
- Bear Island was required to install wastewater storage basins (which are used often), and is allowed to discharge stored wastewater under a "control equation" in proportion to higher River flows;
- Bear Island is allowed to use any unused part of County's waste load allocation, *e.g.*, when King's Dominion closed.
- The County and Bear Island were required to enter into a contract, approved by the Virginia Attorney General, for wastewater services and compliance. This contract requires Bear Island to: (a) comply with all Permit requirements; and (b) pay for weekly River sampling runs to assure that the discharges did not contravene water quality standards. In addition, the contract required the Mill to buy treated water from the County and pay off the County's bonded indebtedness on its under-utilized Doswell Utilities.

The Mill began operations in 1979, and Bear Island and the County have cooperated successfully as partners for 33 years. Here is a summary of the parties' performance:

- No Permit violations in 33 years.
- Weekly River sampling runs have shown no water quality standards violations.
- Bear Island paid off the Doswell Utilities' bonded debt by early 1990's.
- Bear Island and Hanover remain good partners and, as discussed below, a complementary match in their combined discharge.

<u>Proposed</u> <u>Condition 30</u>. This proposed new condition would make dramatic changes in the regulation of Bear Island's operations. Specifically, this condition would:

- Require Hanover County and Bear Island to conduct very expensive additional water quality modeling work on the segments of the North Anna, South Anna and Pamunkey Rivers, or accept the results of the DEQ's desktop modeling;

- Eliminate the "control equation" which has allowed wastewater discharges in proportion to stream flow rates, and replace the control equation with effluent limitations based on two flow tiers;
- Lead to separate VPDES permits for the County and Bear Island wastewater discharges; and
- Potentially require many millions of dollars in new capital improvements to Bear Island's wastewater treatment plant. To put this magnitude of capital investment in perspective, please remember that this Mill and the three other paper mills in the group have just emerged from bankruptcy and there is little or no money or credit available to make any such improvements.

Water Quality Modeling. The stated reason to require new water quality modeling of the North Anna-South Anna-Pamunkey River system in the Hanover area is the reduction in minimum release rates from Lake Anna. In 2000, the Lake Level Contingency Plan statute ("Statute") was enacted to authorize release reductions to maintain higher lake levels during droughts.[2]

Bear Island and Hanover worked hard to obtain the legislative compromise embodied in the Statute, which states that:

> "The reduction in release amounts … shall not be implemented to … result in an adverse impact to (i) the ability to meet water quality standards based on permitted discharge amounts."

In other words, the Statute says that downstream users will not be required to reduce their "permitted discharge amounts" as a result of the reductions in releases.

As we see it, it is neither authorized nor fair in the circumstances for DEQ to try to reduce our "permitted discharge amounts" as a result of these release reductions. Bear Island did not object to individual episodes of release reductions during droughts, because Bear Island believed that, during droughts, the scarce resource should be shared. Bear Island was able to operate its water intake structures during these times and, as noted earlier, there were no water quality problems in the river despite the lower flow rates. However, Bear Island has never been given notice that DEQ staff would try to use these lower flows to reduce the 7Q10 flow rate and reduce the Mill's discharge limitations.[3] Bear Island hereby serves notice with the State Water Control Board and Department of Environmental Quality staff

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2 This is not a nuclear safety issue, although the Lake was built by Virginia Power to cool its two nuclear reactors. Instead, the concerns that prompted the Statute were raised by people who built homes around the Lake and do not want the Lake drawn down a foot or two by minimum releases to maintain downstream flows.

3 The "7Q10 flow rate" is the flow that occurs for seven consecutive days once every ten years, and is the basis for calculating the assimilative capacity of waters receiving wastewater discharges. The lower the 7Q10 flow rate, the lower the effluent limitations will be.

that it is and will be adversely impacted by any future release reductions from the Lake Anna Dam below 40 cfs, and requires that no such reductions be made.

Bear Island objects to doing any more water quality modeling, which could cost as much as $500,000. Despite repeated requests, we have not been told of any other case where an existing industry has been required to conduct new water quality modeling just to stay in business under current operations.

Bear Island also objects to the DEQ's threatened use of its desktop model to develop effluent limits if Bear Island and the County will not prepare their own model. The DEQ's model is very simple and extremely conservative and, as DEQ staff will acknowledge, yields much lower limitations than a properly calibrated and verified Qual2K model (the EPA standard) would produce. The evidence of this is already in hand; DEQ Piedmont staff ran its model and obtained limits that are less than one-half of existing limits. Bear Island's engineering consultants estimate that the capital improvements required to meet those limits would cost many millions of dollars, and that estimate does not include any costs of operations or maintenance. Imposition of such a requirement could lead to closure of the Mill.

Hanover County has suggested a proposed compromise under which water quality modeling could be conducted. This proposal calls for use of a computed 7Q10 flow rate based on an adjusted flow record from the new North Anna gage (01671025 North Anna River above Little River near Doswell, Virginia). Specifically, for each day during the period of record when the release rate from the Lake Anna Dam was below 40 cfs, the difference between the amount actually released and 40 cfs would be added to the reading at this gage. This would eliminate the effects of the release reductions for this modeling exercise. Bear Island would support this proposal if new water quality modeling must or will be done.

Antidegradation. Bear Island believes that DEQ has taken the mistaken position that the antidegradation policy applies to the entire North Anna-South Anna-Pamunkey River system in the Hanover area. When the County's Doswell Sewage Treatment Plant was originally permitted, DEQ staff made a determination that the discharge would meet the antidegradation policy for dissolved oxygen concentration. Subsequently, when the Bear Island Mill was proposed, effluent limitations were based on compliance with that policy. However, analysis of the original assessment in light of the State Water Control Board's 1976 York River Basin Plan show that the South Anna River and the Pamunkey River below the confluence of the North and South Anna Rivers were not eligible to be classified as antidegradation stream segments.

Attached hereto are two exhibits relevant to this issue. Exhibit B contains the hand-calculations of the dissolved oxygen profile resulting from the Doswell Sewage Treatment Plant's discharge. These calculations were prepared in 1973 by R. F. Tesh, a staff engineer with the State Water Control Board. Exhibit C is an extract of relevant text and a graph from the 1976 York River Basin Plan. Mr. Tesh's calculations assume that the dissolved oxygen concentration in the Pamunkey River increases significantly as a result of higher quality water from the South Anna River. This assumption that the South Anna River oxygen concentration was at saturation ignores the existence of the significant water quality problems on the South Anna River, particularly from the Town of Ashland 0.75 mgd sewage lagoon located only several miles upstream.

The York River Basin Plan states (at Vol. V-A, p.31) as follows:

> F. <u>Water Quality Problem Areas</u>
>
> 1. <u>Significant Problems</u>
>
> Significant water quality problem areas are defined as those areas where stream standards are consistently being violated. A detailed discussion about these areas appears later in this report, and the discussion here is limited to a summary of potentially significant water quality problem areas.
>
> 1. South Anna River:
>   a. [Gordonsville discussion omitted]
>   b. In the vicinity of and just downstream of Ashland's treatment plant.

The Report also includes a graphic (Figure 4, p.57) entitled "Estimated Dissolved Oxygen Profile of the North Anna and Pamunkey Rivers Under 1977 Loading Conditions". This profile shows – contrary to Mr. Tesh's assumption – that the dissolved oxygen profile drops at the confluence of the North and South Anna Rivers as a result of lower quality water from the South Anna.

For these reasons, the South Anna and Pamunkey Rivers below the confluence should not be deemed to have, or be eligible for, antidegradation classification in determining applicable effluent limitations. Thus, any modeling work done should not assume that the antidegradation policy applies in these streams.

<u>Requirement of Separate Permit for Bear Island</u>. Despite repeated requests, DEQ staff have not provided any citation to any law or regulation that would require Bear Island to have a separate permit. Bear Island's diligent legal research effort has not uncovered any such requirement.

The reasons for the admittedly-unusual Permit arrangement have been recited above. Hanover County and Bear Island have worked together as partners under the Permit for 33 years without any violations or water quality problems. The arrangement is clearly beneficial to both parties, as Bear Island is entitled to use any unused County discharge allocation. The County's plant is only used to a significant degree when the King's Dominion Amusement Park is in operation during the Summer season; during the other three seasons of the year, sewage inflows to the plant are quite small. Separation of the two discharges would greatly damage Bear Island, as it would lose the right to use this unused capacity during the colder seasons of the year, when waste loads from its operations are highest. Therefore, Bear Island objects to any requirement to obtain a separate VPDES permit.

<u>Elimination of the Control Equation</u>. Again, despite many requests, DEQ staff have not provided any law or regulation that would require elimination of the control equation in favor of seasonal tiers. Neither has Bear Island found any such requirement.

When originally permitted, Bear Island accepted much stricter effluent limits than paper mills typically receive, to mollify concerns raised by citizens about water pollution. Bear Island installed and actively uses three lined wastewater storage basins, and was granted the right to discharge stored wastewaters in proportion to higher River flows. Bear Island has never violated its obligations under the Permit: to repeat, Bear Island has had no Permit violations and caused no water quality violations in 33 years of operations.

<u>Adverse Effect on Mill</u>. Bear Island does not have the capital to invest in major modifications to its wastewater treatment plant. If such a large capital expenditure were required to continue operations, the Mill would likely have to close. The effects of such a closure would be:

- Loss of the Mill's 198 manufacturing jobs which pay, on average, $89,000 per year in wages and benefits.
- Loss of $700,000 per year in Real Estate Taxes paid to Hanover County.
- Loss of $44,000 per year in Severance Taxes.
- Loss of $55,000 per year of Sales Taxes.
- Loss to Hanover County of $145,000 per year for River water quality sampling and monitoring.
- Loss to Hanover County of $1,055,000 for purchased treated water used in the Mill.

The Bear Island Mill has a total manufacturing budget of $111,718,723 per year. Most of this budget is spent nearby in Virginia, which indirectly affects many more people than just the 198 direct Mill jobs. The Mill has 1458 vendors supplying goods and services that would lose business in the Mill were to close down.

<u>Conclusion</u>. Bear Island objects to the inclusion of the proposed Condition 30 in the draft Permit for all the reasons stated herein, and requests a public hearing if Condition 30 is not removed. The requirements of the proposed Condition 30 are unwarranted in light of 33 years of operations, and are not mandated or authorized by statute or regulation. Bear Island reserves its rights to supplement these comments and to pursue any and all legal remedies with respect to the proposed changes to the Permit.

We will appreciate your close attention to these concerns. Please contact me to arrange a meeting to discuss these matters further, and let me know if you need any further information or have any questions.

Sincerely,

BEAR ISLAND PAPER WB, LLC

By: Wayne Griffin

Wayne Griffin
Mill Manager

cc: Steven P. Herzog, Hanover County

EXHIBIT A

1. Order of Virginia State Corporation Commission, dated June 12, 1969, authorizing construction of the Lake Anna Dam, reported in O.B. 58, p. 353, Annual Rep't of State Corporation Comm'n (1969-70), at 98.

2. *Vaughan v. Virginia Electric and Power Company*, 211 Va. 500, 178 S.E.2d 682 (1971), which affirmed that decision of the State Corporation Commission.

3. Official Opinion of Virginia Attorney General to Mr. A. H. Paessler, Executive Secretary, State Water Control Board, February 5, 1971, reported in Op. Va. Att'y Gen. (1970-71).

AND THE COMMISSION having considered the application herein, the investigation made by the Commissioner of Banking and the evidence introduced at the hearing, a majority of the Commission, Commissioner Catterall dissenting, is of the opinion and finds, that public convenience and necessity will be served by permitting the applicant to establish a branch office at 621 West Center Street in the Town of Manassas, Prince William County, Virginia, and that the applicant should be authorized to establish said branch office upon the condition hereinafter stated.

IT IS, THEREFORE, ORDERED that Prince William Savings and Loan Association be, and it is hereby, authorized to establish a branch office at 621 West Center Street in the Town of Manassas, Prince William County, Virginia, provided the applicant establishes said branch office and opens it for business within nine months from this date and upon the opening of said office, it notify the Commissioner of Banking the date said branch office was opened for business.

CASE NO. 18669

Application of:
Virginia Electric and Power Company

For a license to construct a dam across the North Anna River in Louisa and Spotsylvania Counties and associated dikes under Chapter 7 of Title 62.1 of the Code of Virginia.

ORDER OF JANUARY 30, 1969, O. B. 58, p. 61

ON JANUARY 29, 1969 came Virginia Electric and Power Company and filed its application and exhibits therewith for a license to construct a dam across the North Anna River in Louisa and Spotsylvania Counties and associated dikes. The dam will create a reservoir to provide cooling water for the North Anna Power Station to be constructed by the applicant on the southern shore of the reservoir approximately 5.7 miles upstream from the dam.

UPON CONSIDERATION OF WHICH IT IS ORDERED:

(1) That this proceeding be instituted, assigned Case No. 18669, docketed and set for hearing in the Courtroom of the State Corporation Commission, Blanton Building, Richmond, Virginia, at 11:00 A.M. on March 4, 1969, at which time and place the applicant and any other interested person, firm, association or corporation shall be given an opportunity to present facts, evidence and argument for and against the granting of the application;

(2) That the application give notice to the public of its application by publication once in each week for four successive weeks prior to the date set for hearing in a newspaper or newspaper of general circulation published in the Counties of Orange, Louisa, Spotsylvania, Caroline, Hanover, King William, King and Queen, Gloucester, New Kent, James City, and York, and if there be no such newspaper, then by publishing in a newspaper of general circulation in said counties, the following:

NOTICE TO THE PUBLIC

Notice is hereby given that on January 29, 1969, the Virginia Electric and Power Company filed with the State Corporation Commission its application for a license to construct a dam across the North Anna River in Louisa and Spotsylvania Counties, Virginia, and associated dikes, approximately four miles north of the Town of Bumpass, Virginia, and approximately one-half mile upstream from the point at which Virginia Route 601 crosses the North Anna River. The dam will create a reservoir to provide cooling water for the North Anna Power Station to be constructed by the Company on the southern shore of the reservoir about 5.7 miles upstream from the dam. The reservoir will be located in Louisa, Spotsylvania and Orange Counties. It will extend approximately 19 miles upstream from the dam site and will have a surface area of approximately 9600 acres.

Notice is further given that the State Corporation Commission has set March 4, 1969 as the date for a public hearing on the application in its Courtroom, Blanton Building, Richmond, Virginia, at 11:00 A.M., and at such public hearing the applicant and any other interested person, firm, association or corporation shall be given an opportunity to present facts, evidence and argument for and against the granting of the application.

Descriptions, maps and plans of the proposed development are on file in the offices of the State Corporation Commission at Richmond, Virginia, and in the offices of the Director of the Department of Conservation and Economic Development at Richmond, Virginia, and also in the offices of the Virginia Electric and Power Company, 700 East Franklin Street, Richmond, Virginia, at any of which places they may be seen and examined by any interested person.

VIRGINIA ELECTRIC AND POWER COMPANY

and furnish proof of the giving of such notice at the time of the hearing;

(3) That the applicant file a copy of its application and exhibits therewith and a copy of this order with the Director of Conservation and Economic Development on or before February 8, 1969.

ORDER OF APRIL 2, 1969, O. B. 58, p. 192

THIS APPLICATION was heard on March 4th and 5th, 1969, pursuant to the order of the Commission of January 30, 1969. At the conclusion of the hearing on March 5th, the Commission took this matter under advisement. The Commission having considered the testimony and evidence presented at the hearing on March 4th and 5th is of the opinion that further investigation of this application should be made. To this end, the Commission has engaged the services of an independent consulting engineer. Therefore, another hearing on this application will be necessary to receive his report and consider any other relevant testimony in this matter.

THEREFORE, IT IS ORDERED that an additional hearing in this proceeding be set on May 1, 1969 in the Courtroom of the State Corporation Commission, Blanton Building, Richmond, Virginia at 10:00 A.M. at which time the Commission will receive the report of its consultant and such other relevant testimony as may be presented.

ORDER OF APRIL 15, 1969, O. B. 58, p. 230

BASED ON the estimated time requirements of the independent consulting engineer to complete his survey and report, the Commission finds that the May 1, 1969 hearing date set for receiving this report must be changed.

THEREFORE, IT IS ORDERED that the hearing set for receiving the report of the Commission's consultant and such other relevant testimony as may be presented, be changed from May 1, 1969 to May 21, 1969 at 10:00 A.M. in the Courtroom of the State Corporation Commission, Blanton Building, Richmond, Virginia.

ORDER OF JUNE 12, 1969, O. B. 58, p. 353

THE APPLICATION herein was heard on March 4 and 5, 1969, and taken under advisement, it appearing that the notice to the public required to be published by the Commission's order of January 30, 1969, had been given as required by that order, and that a copy of the application herein and the exhibits therewith and a copy of the Commission's order of January 30, 1969 had been filed with the Director of Conservation and Economic Development of the Commonwealth of Virginia within ten days after filing said application with the Commission. On April 2, 1969, the Commission entered an order setting an additional hearing in this proceeding for May 1, 1969. By order of April 15, 1969 the May 1, 1969 hearing date was changed to May 21, 1969. Further hearings were held on May 21, 22, and 23, 1969. At the hearings in March and May the applicant was represented by George D. Gibson, Evans B. Brasfield, Guy T. Tripp, III, and Turner T. Smith, Jr., its counsel; interveners were represented by S. Page Higginbotham, counsel for certain landowners, C. Pembroke Pettit for the Louisa County Board of Supervisors, W. W. Whitlock for the Town of Mineral, Mineral Industrial Development Corporation, and Louisa County Industrial Development Corporation; the Commission was represented by its counsel. At the hearings in May additional interveners were represented: C. Champion Bowles, Jr., counsel for the Town of Louisa, W. Kendall Lipscomb, Jr. for New Kent County, Malcolm E. Ritsch, Jr. for Louisa County Water Authority, and D. Nelson Sutton, Jr. for The Chesapeake Corporation of Virginia.

Now On This Day the Commission having considered the application filed herein and the evidence introduced in this proceeding and having weighed all of the respective advantages and disadvantages from the standpoint of the State as a whole and the people thereof and having made appropriate investigation as to the effect of the proposed construction upon cities, towns and counties and upon the prospective development of other natural resources and the property of others, a majority of the Commission is of the opinion and finds from all the evidence in this proceeding, in pursuance of the policy of the State of Virginia as expressed in Chapter 7 of Title 62.1 of the Code of Virginia (1950):

(1) That the plans of the applicant provide for the greatest practicable extent of utilization of the waters of the State for which this application is made;

(2) That the applicant is financially able to construct and operate the proposed dam and associated works;

(3) The general public interest will be promoted by the consummation of the proposed project; and

(4) That the applicant should be licensed pursuant to Chapter 7 of Title 62.1 of the Code of Virginia (1950) for the term therein specified to construct a dam across the North Anna River in Louisa and Spotsylvania Counties, Virginia and associated dikes substantially in accordance with the general and preliminary maps, plans and specifications set forth in the application and the exhibits and evidence in this proceeding, but subject to the limitations, restrictions, requirements and rights reserved to and on behalf of the Commonwealth of Virginia in Chapter 7 of Title 62.1 of the Code of Virginia (1950) and to all of the conditions, restrictions, limitations and requirements set forth in this order.

It Is Therefore Ordered that Virginia Electric and Power Company be licensed and authorized to construct, operate and maintain a dam across the North Anna River between Louisa and Spotsylvania Counties and associated dikes substantially in accordance with the general and preliminary maps, plans and specifications set forth in the application and exhibits and the evidence in this proceeding for the term and subject to the restrictions imposed by Chapter 7 of Title 62.1 of the Code of Virginia (1950).

It Is Further Ordered that the license and authority herein granted be subject, in addition to those imposed by law, to the following conditions, limitations and restrictions:

(1) The licensee shall at all times discharge a flow of water through the dam for low flow augmentation in the amount of at least forty cubic feet per second (40 cfs).

(2) During the period when the reservoir is being filled, the licensee shall at all times release a flow of water through the dam of not less than one hundred and fifty cubic feet per second (150 cfs) during the months of February through June in 1971 and 1972 unless otherwise ordered by the Commission.

(3) That the maps, plans and specifications, submitted with and as a part of the application for the license, be approved and made a part of the license, and no substantial change shall hereafter be made in said maps, plans and specifications until such change shall have been approved by the Commission.

(4) That the proposed construction shall be commenced before the expiration of two years from the date of this order, unless such time be extended; and that the project be completed before the expiration of five years from the date of this order, unless such time be extended.

(5) That this proceeding be continued generally on the docket of the Commission for such other and further action as the Commission may take herein.

(6) That an attested copy hereof be sent to the applicant as and for the license herein granted, and an attested copy be sent to counsel for each of the parties appearing herein, and to the Chief Engineer-Electric Utilities of the Commission.

HOOKER, *Commissioner,* dissents for the reasons stated in the memorandum filed herewith.

APPLICATION OF VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. 18669

HOOKER, *Commissioner,* Memorandum of Dissent:

As to the elevation of the reservoir and the lagoons, I am of the opinion that a reservoir elevation of 240 feet above mean sea level (10 feet lower than proposed) and a lagoon of approximately 245 feet (6½ feet lower than that proposed) will meet every requirement of the applicant.

Counsel for the applicant, in his closing argument, stated that while not forsaking his original position, as an alternative, that 241 feet for the dam and 251 feet for the lagoon would be acceptable. This would result in an increase in the maximum drawdown of slightly in excess of one foot and will not have any adverse effect on recreation.

It is obvious that a 10 foot reduction in the height of the dam (which is a mile wide) would reduce the cost of construction substantially. The Commission is obligated to require utilities to operate as economically as possible.

The Commission certainly should not approve a higher dam than is needed to meet the reasonable requirements of the applicant. The ultimate effect of this decision is to give to the applicant the right to exercise the power of eminent domain. The law of eminent domain is a drastic law and should never be permitted to be exercised unless it is an absolute necessity required to adequately meet the demands of the public.

Opinion, CATTERALL, *Chairman.*

The Commission's final order of June 12, 1969, authorized the Virginia Electric and Power Company to impound the waters of the North Anna River to the extent necessary for the operation of an atomic energy plant for the generation of electricity.

§62.1-83 of the Code of Virginia forbids the construction without a license of two kinds of dams: (1) "any dam across or in the waters of the State" or (2) "a dam . . . for the purpose of generating hydroelectric energy." Counsel for appellants takes the position that this section does not apply to this case because the dam is not to be for the purpose of generating hydroelectric energy. The water is to be used not as a source of energy but for the purpose of cooling the plant. Our conclusion of law is that the section does apply to this case under both (1) and (2):—(1) because the North Anna River comes within the definition of "waters of the State" and (2) because an atomic plant has the same impact on all the relevant statutory provisions as a hydroelectric plant.

The relevant statutory provisions are enumerated in §62.1-88:

> "Before acting upon any application, the Commission shall weigh all the respective advantages and disadvantages from the standpoint of the State as a whole and the people thereof and shall make such investigation as may be appropriate as to the effect of the proposed construction upon any cities, towns and counties and upon the prospective development of other natural resources and the property of others."

The statute requires the Commission to balance the conflicting interests of all persons that will or can be affected by the project. The interest of people below the dam conflicts with the interest of those above the dam. Hence the downstream interests have to be weighed against the upstream interests. The downstream interveners want more than 40 cubic feet per second to be released and the upstream interveners want less than 40 cubic feet per second to be released. The release of more than 40 cubic feet will be more beneficial for fish and game and for possible future factories. The release of less than 40 cubic feet will make the resulting reservoir more valuable for recreation. There is difference of opinion as to the optimum height of the dam. Two of the Commissioners are convinced that the company's proposal of 250 feet is better than the 240 feet advocated by Judge Hooker. The higher dam will flood more land, but the lower dam will increase the maximum drawdown by more than a foot. The extra drawdown of one foot would expose considerably wider mudflats in places where the slope of the land is gentle. The suggestion of some of the interveners that the company be required to excavate the sides of the reservoir to make them vertical like the sides of a swimming-pool is not practicable.

Finally, there is a conflict between the upstream landowners whose lands will be flooded and those whose lands will not be flooded. The value of the land fronting on the artificial lake will increase greatly. The land taken and damaged will have to be paid for by the power company, and we have to presume that fair compensation will be paid. Money compensation covers only economic loss, and we sympathize as deeply as Judge Hooker with the farmers who will lose their ancestral homes. They are the 68 interveners who have appealed our decision. Nearly every condemnation of land for a public purpose, whether for a power plant, a power line, an urban expressway or urban "renewal" leaves private tragedy in its wake. Against the devastating effect that this dam will have on the 68 interveners we have to weigh the needs of the consumers of electricity. Virginia Electric and Power Company supplies electricity directly to about 800,000 residential, 90,000 commercial and 750 industrial consumers, and indirectly to the customers of the electric cooperatives and the dwellers in public housing projects. All told, many more than a million Virginia consumers would suffer if there should be a shortage of electricity. The panic that swept through New York City last summer illustrates the potential threat. The Consolidated Edison Company is endlessly vilified by New Yorkers for not building more generating plants, and is prevented from building more generating plants by endless litigation instituted by New Yorkers. The consumers' demand for electricity is increasing so rapidly that Vepco must double its plant every eight or ten years. Simultaneously, the consumers (everybody is a consumer) demand that the necessary power plants and transmission lines be located anywhere except where the company plans to locate them. Last summer the most violent denunciations in New York's crisis were directed by New York's major and the "New York Times" against the New York Public Service Commission for not having forced the power company to build more power plants.

It takes years to build a large generating plant, and the companies must make their plans for new construction years before the increased demand for electricity can be estimated with complete accuracy. To us it is clear that the North Anna plant is essential to the welfare of the consumers in Virginia and that the work should go forward as speedily as possible. The decision of this Commission is not the last word on the subject. The United States Army Corps of Engineers has to be satisfied that the dam will not hurt the navigable waters of the United States, and the Atomic Energy Commission has to be satisfied that the plant complies with its strict requirements for the safety of the public.

We have given this application our most careful consideration in accordance with the statutory requirements. Some of the interveners urged upon us the desirability of postponing decision for a year or two in order to obtain more information about the dam's possible effect on the estuarine ecology. In the words of §62.1-88: ". . . from the standpoint of the State as a whole and the people thereof . . ." any delay could have disastrous consequences.

DILLON, *Commissioner,* concurs.

HOOKER, *Commissioner,* dissenting:

I concur with my fellow Commissioners in their finding that the project as proposed by the Company meets the requirements of the statute and that the Commission has the authority under the Water Power Act to license this project. I also am of the opinion that the applicant has shown the need for the electric power to be generated at this facility and agree that the North Anne Plant is essential to the welfare of consumers in Virginia and that the applicant should be granted a license to construct and operate a dam.

My dissent is predicated on my opinion that the project as proposed by the applicant will use more land than necessary to accomplish its goals. The Water Power Act in §62.1-90 states:

> "If the Commission be of the opinion, from the evidence before it, that the prospective scheme of development is inadequate or wasteful . . . the Commission may require the applicant to modify the plans for the development in such manner as may be specified by the Commission. . . ."

A design that requires more land to be taken by condemnation than would be needed if another design were followed can only be described as wasteful. Land is a precious commodity and the law of eminent domain is a drastic law. I believe that it is incumbent upon this Commission to require the applicant to take as little land as may be required to meet the essential needs of the project. That the Commission has the authority to require a change in the design plans is abundantly clear in §62.1-90.

After the conclusion of the hearings on March 4th and 5th, I visited the site of the proposed dam and reservoir. This trip was made on March 19, 1969. At my suggestion the Commission agreed to engage the services of a qualified consultant. Dr. Frank L. Parker of Vanderbilt University was contacted and he met with the Commission on April 1, 1969. At that time the Commission agreed unanimously to engage Dr. Parker's services. The assignment given to Dr. Parker was to study the application in this case and to place "primary emphasis on examination of the area of reservoir, surface and corresponding elevation required . . ." (Tr. p. 54, 55).* The principal reason for hiring Dr. Parker was to make an independent study of the application to see if the amount of land required by the Vepco design could be reduced.

Dr. Parker's report concluded (Exhibit 17, p. 18) that it would be feasible to build the dam for a normal operating reservoir of 240 feet, 10 feet lower than that proposed by Vepco. This testimony was not refuted. Counsel for the applicant, in his closing argument, stated (Tr. p. 485) that their calculations showed that a reservoir level of 241 feet and a lagoon elevation of 251 feet would comply with the thermal limitations of the State Water Control Board. Vepco's objections to any re-design of the project were based on the increased operating costs occasioned by a two-level project and by additional construction cost. Further studies by Dr. Parker have shown that the project can be built to the full projected electrical capacity with the reservoir elevation at 240 feet and the lagoon elevation at 245 feet. This will reduce the extra operating expense caused by pumping by approximately 50%. Much of the additional capital expense which Vepco claimed would be caused by additional surveys and redesign of the project as originally proposed.

It is obvious that a project must be sufficiently planned and the design detailed enough prior to application for a license to give a clear and full understanding of the proposed development. The cost of this design is a normal cost of business. It is also obvious that the Commission has the authority in §62.1-90 to require the applicant to modify the plans. The cost of the change of design is also a normal part of doing business. If the Commission were to refuse to require a change in design solely because the utility had already incurred expense for the original plans, then the Commission would not be fulfilling its mandate as set forth in §62.1-90.

The Commission hired an expert engineer to advise it on this project generally and on the size and elevation of the reservoir specifically. Having received advice from our expert that the purposes for which the project is designed could be fulfilled and use less land, I am of the opinion that the advice should be followed unless there are compelling reasons otherwise. I do not believe that the applicant has shown these compelling reasons and therefore I do not concur with the majority opinion.

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* This and all other references to the transcript in this dissenting opinion refer to the transcript taken on May 21-23, 1969.

Richmond

J. B. VAUGHAN, ET AL. v. VIRGINIA ELECTRIC AND POWER COMPANY.

January 18, 1971.

Record No. 7373.

Present, Snead, C.J., I'Anson, Carrico, Gordon and Harman, JJ.

(1) Waters of State—Dam—Authority of State Corporation Commission.

(2) Corporation Commission—Dam Project—Land Acquisition.

1. As to "waters of State" authority of State Corporation Commission extends to licensing of any dam proposed to be constructed in or across such waters regardless of purpose for which dam is to be used. Dam project to generate energy for interstate transmission affects the interests of interstate commerce which constitutes stream "waters of State".

2. Issue before State Corporation Commission was whether license to construct dam should be granted. Question of extent and nature of land to be acquired not proper for consideration by Commission. These matters were properly left for determination by appropriate court in eminent domain proceedings.

Appeal from an order of the State Corporation Commission.

Affirmed.

S. Page Higginbotham (*Higginbotham & Fry*, on brief), for appellants.

George D. Gibson (*Evans B. Brasfield; Guy T. Tripp, III; Hunton, Williams, Gay, Powell & Gibson,* on brief), for appellee.

CARRICO, J., delivered the opinion of the court.

The principal question involved in this appeal is whether the State Corporation Commission had authority to grant Virginia Electric and Power Company a license to construct a dam across the North Anna River in Louisa and Spotsylvania counties.

VEPCO filed an application praying for issuance of the license. J. B. Vaughan and various other landowners affected by the proposed construction intervened in protest against the project. After a hearing, the Commission granted the license. The protesting intervenors are here on an appeal of right.

The evidence before the Commission showed, so far as is pertinent here, that VEPCO proposed to construct an electric generating station on the south shore of the reservoir to be created by the dam in question. The station would employ nuclear fuel to create steam and thereby supply the energy to rotate turbines for the production of electricity. Water from the reservoir would be used to cool the closed service system furnishing steam to the turbines. The water, which becomes heated in such a process, would then be diverted to lagoons to be cooled before being returned to the reservoir. Thus, the impounded water would be used not to rotate turbines for the production of electricity, as is true in a conventional hydroelectric plant, but for cooling purposes in the nuclear plant.

[1] VEPCO contends that the Commission had authority to grant it a license under the provisions of Code §§ 62.1-83 and 62.1-85. Those sections provide that a license is required from the Commission before any dam may be constructed "across or in the waters of the State" or "in any rivers or streams within the State when such dam is for the purpose of generating hydroelectric energy for use or sale in public service."

The protesting intervenors contend that under the foregoing statutory language, the Commission, in this type of case, has authority to license dams for hydroelectric purposes *only* and that since VEPCO's proposal is for a project employing nuclear energy, the Commission's action in issuing the license was void. This contention, however, disregards the distinction between the terms "waters of the State" and "waters within the State" in the statutory scheme fixing the authority of the Commission.

The term "waters of the State" is defined in Code § 62.1-81 to include navigable streams and "any stream or part thereof . . . in which the construction of any dam or works as authorized by this chapter would affect the interests of interstate or foreign commerce." While the term "waters within the State" is not defined, it is obviously meant to include all streams not described as "waters of the State."

Thus, with respect to the licensing of dam projects, the legislature in the above cited Code sections has recognized two classes of waters: those "within the State" and those "of the State." As to "waters within the State," the authority of the Commission is limited to the licensing of a dam for hydroelectric purposes only.[1] But as to "waters of the State," the authority of the Commission extends to the licensing of *any* dam proposed to be constructed in or across such waters regardless of the purpose for which the dam is to be used.

Therefore, since the project proposed by VEPCO would not be for hydroelectric purposes, the crucial inquiry becomes: Is it a "water of the State" that VEPCO proposes to dam in the development of its project?

The evidence before the Commission showed that the electric energy to be generated at the proposed project would flow through VEPCO's interstate transmission network. The rule is that projects generating energy for the interstate transmission of electricity affect commerce among the states. *Federal Power Commission* v. *Union Electric Co.*, 381 U.S. 90, 94 (1965). It follows that construction of the dam in and across the North Anna River would "affect the interests of interstate or foreign commerce" within the meaning of Code § 62.1-81 and constitute that stream a water "of the State" under Code § 62.1-83. These circumstances required licensing of the project pursuant to Code § 62.1-85, thus vesting authority in the Commission to grant the license in question to VEPCO.

[2] The protesting intervenors also contend that in granting the license, the Commission should have limited what land VEPCO may take in fee in eminent domain proceedings for use in the project. It is argued that the "area around the plant site and the dam site" is all that should be taken in fee and that only an easement should be acquired "for the reservoir and the flood area and the maintenance area."

When this point was raised below, the Commission ruled that the question of the extent and nature of the interests to be acquired for the proposed project was not a proper one for its consideration. We agree. The only issue before the Commission was whether VEPCO should be licensed to construct the dam. The Commission's action in granting the license did not determine how much land and what interest therein VEPCO might acquire. Those are matters properly left for determination by the appropriate court in eminent domain proceedings.

The final order of the Commission will be affirmed.

Affirmed.

[1] In the view we take of the case, we need not consider VEPCO's alternative contention that the Commission has permissive authority under Code § 62.1-99 to license dams in "waters within the State" for other than hydroelectric purposes.

now is codified as Chapter 3.1 of Title 62.1 of the Code of Virginia, as amended. In responding to your inquiry it is necessary to review three particular aspects of the Act: (A) State policy; (B) State control; (C) Board powers.

(A) In Section 62.1-44.2 of the Code of Virginia the General Assembly declared:

> ". . . It is the policy of the Commonwealth of Virginia and the purpose of this law to: (1) *protect* existing high quality State waters and restore all other State waters to such condition of quality that any such waters will permit all reasonable public uses and will support the propagation and growth of all aquatic life, including game fish, which might reasonably be expected to inhabit them, (2) *safeguard* the clean waters of the State from pollution, (3) *prevent* any increase in pollution, and (4) *reduce* existing pollution, in order to provide for the health, safety, and welfare of the citizens of the Commonwealth." (Emphasis added.)

(B) Section 62.1-44.4 of the Code states clearly:

> "(1) . . . The right and control of the State in and over all State waters is hereby expressly reserved and reaffirmed . . . ."

(C) The State Water Control Board was created by the General Assembly as the mechanism by which State policy would be executed. Section 62.1-44.15 of the Code outlines some of the *broad powers* of the Board. They include, among others, the authority to *exercise general supervision and control over the quality of all State waters,* to study and investigate all problems concerned with the quality of State waters, *to establish quality standards,* to conduct scientific experiments, to issue certificates for discharge of sewage, industrial and other wastes, to make investigations and inspections, *to insure compliance with Board orders and rules,* to adopt rules governing Board procedure, *to issue cease and desist orders* to owners who are permitting or causing water pollution, to adopt such regulations as it deems necessary to enforce general water quality management programs of the Board, to investigate any large-scale killing of fish, to establish policies and programs for effective area-wide or basin-wide water quality control and management, and *to establish requirements for the treatment of sewage, industrial wastes and other wastes* that are consistent with the general purposes of the State Water Control Law. In addition, the Board is authorized *to enforce its rules, regulations or orders by injunction, mandamus or other appropriate remedy.* See § 62.1-44.23 of the Code.

Based upon the foregoing, I am of the opinion that the State Water Control Board is empowered to adopt and enforce the water quality standards to which you refer in your letter.

WATER CONTROL BOARD—Powers to Control Stream Flow Releases—Defined.

February 5, 1971

MR. A. H. PAESSLER, Executive Secretary
State Water Control Board

This will acknowledge receipt of your letter of January 29, 1971, in regard to the powers of the State Water Control Board. The letter states as follows:

> "On June 12, 1969 the State Corporation Commission, following hearings, granted the Virginia Electric and Power Company a license to construct a nuclear power station on the North Anna River. The license contained provisions setting forth a minimum release schedule for flows from the impoundment.

"On April 7, 1970 the State Water Control Board convened a hearing in accordance with Section 62.1-27(5) of the State Water Control Law for the purpose of determining if Certificate #1912, issued to the Virginia Electric and Power Company on June 19, 1968, should be amended to incorporate a release schedule which provided for higher minimum releases than those established by the State Corporation Commission.

"By letter of June 25, 1970 Governor Holton designated the State Water Control Board to act as the State agency to certify to Federal licensing agencies, under Section 21(b) of Public Law 91-224, that activities conducted by licensees would be such that there is reasonable assurance that such activities will not cause a contravention of water quality standards.

"At its meeting on November 18, 1970, the State Water Control Board amended Certificate #1912, issued, under the State Water Control Law to the Virginia Electric and Power Company on June 19, 1968, and in addition, directed that the staff issue, in accordance with Section 21(b) of Public Law 91-224, a certificate of assurance certifying that the proposed construction and operation of the North Anna Power Station would not result in contravention of water quality standards. Both of the above certificates contain provisions for higher minimum flow releases than those set forth in the State Corporation Commission's license.

"The State Water Control Board is concerned about present and future jurisdictional disputes between State agencies in matters such as these. If the Board acted improperly, it may wish to reconsider its decision and the Board has requested that we obtain an opinion from you concerning the following:

"1. Did the State Water Control Board have the legal authority to act in amending Certificate #1912 issued to the Virginia Electric and Power Company on June 19, 1968 by requiring an average instantaneous flow release schedule greater than the minimum average instantaneous flow release schedule provided in the license to construct issued by the State Corporation Commission on the grounds that these greater releases were necessary to protect the water quality downstream from the North Anna Power Station?

"2. Regardless of your findings in 1, above, does the Board have legal authority to issue a certificate of assurance under Section 21(b) of Public Law 91-224 and to incorporate in that certificate a requirement of an average instantaneous flow release schedule greater than the schedule set forth in the license issued by the State Corporation Commission on the grounds that the greater releases are necessary to insure protection of water quality downstream?

"Your early response to our request will be appreciated."

Your questions require the consideration of an apparent discrepancy between the provisions of Chapter 3.1 of Title 62.1 of the Code of Virginia (1950), as amended (Water Control Law) and those of Chapter 7 of Title 62.1 (Water Power Act). The discrepancy takes on added significance in view of the problems associated with increasing total energy consumption by an expanding population and the intensified efforts to improve the quality and purity of the waters of the Commonwealth.

The policy of the State regarding water quality and the purpose of the recently amended State Water Control Law are stated in § 62.1-44.2 of the Code:

> "It is the policy of the Commonwealth of Virginia and the purpose of this law to: (1) protect existing high quality State waters and restore all other State waters to such condition of quality that any such waters will permit all reasonable public uses and will support the propagation and growth of all aquatic life, including game fish,

> which might reasonably be expected to inhabit them, (2) safeguard the clean waters of the State from pollution, (3) prevent any increase in pollution, and (4) reduce existing pollution, in order to provide for the health, safety, and welfare of the citizens of the Commonwealth."

In addition, § 62.1-44.4 provides that no right exists to continue existing quality degradation of the waters of the State; that the right and control of the State over State waters is expressly reserved and reaffirmed; that those waters whose existing quality is better than established standards will be maintained at that high quality, and that where variances from such are allowed the necessary degree of waste treatment to maintain high water quality will be required wherever physically and economically feasible.

In order to implement the announced policy of the State and the objectives of the Water Control Law, the State Water Control Board is granted broad powers under § 62.1-44.15 of the Code. These powers include, among others, the authority: to exercise general supervision and control over the quality of all State waters, to study and investigate all problems concerned with the quality of State waters, to establish quality standards, to conduct scientific experiments, to issue certificates for discharge of sewage, industrial and other wastes, to make investigations and inspections; also, to insure compliance with Board orders and rules, to adopt rules governing Board procedure, to issue cease and desist orders to owners who are permitting or causing water pollution, to adopt such regulations as it deems necessary to enforce general water quality management programs with the Board, to investigate any large-scale killing of fish, to establish policies and programs for effective area-wide or basin-wide water quality control and management; and to establish requirements for the treatment of sewage and industrial wastes and other wastes that are consistent with the general purposes of the State Water Control Law.

The General Assembly has stated that the conservation and utilization of the otherwise wasted energy to be derived from water resources is also a concern of substantial magnitude. In this regard § 62.1-80 of the Water Power Act declares the policy of the State to be:

> ". . . to encourage the utilization of the water resources in the State to the greatest practicable extent and to control the waters of the State, as herein defined, and also the construction and reconstruction of a dam in any rivers or streams within the State for the generation of hydroelectric energy for use or sale in public service, all as hereinafter provided."

The Water Power Act confers upon the State Corporation Commission jurisdiction over all dams across or in the waters of the State as defined in § 62.1-81 of the Code. See also *Vaughn* v. *VEPCO*, —— Va. ——, —— S.E.2d —— (1971). Section 62.1-82 provides that "[t]he control and regulation on the part of the State of the development of the waters of the State shall be paramount, and shall be exercised through the agency of the State Corporation Commission . . . ."

Correspondingly, § 62.1-83 of the Code provides, among other things, that no corporation proposing to construct or reconstruct any dam across or in the waters of the State shall undertake the same without first having complied with Chapter 7 of Title 62.1 of the Code. In addition, § 62.1-85 of the Code requires the obtaining of a license from the State Corporation Commission prior to construction, the application for which "shall be accompanied by such maps, plans and other information as may be necessary to give a clear and full understanding of the proposed scheme of development, and of dams, generating stations or other major structures, if any, involved therein."

In granting such licenses, the State Corporation Commission is authorized by § 62.1-91 of the Code to impose ". . . such terms and conditions with respect to the character of construction, operation and maintenance of the proposed dam and works as may be reasonably necessary in the opinion of the Commission in the interest of public safety . . . ." More importantly, this same section authorizes the State Corporation Commission to ". . . determine what provision, if any, shall be made by the licensee to prevent the unreasonable obstruction of then existing navigation or *any unreasonable interference with stream flow.*" (Emphasis supplied.)

Any apparent discrepancy with respect to the authority of the State Water Control Board and that of the State Corporation Commission in this area is resolved by the language of the statutes themselves. Section 62.1-82 of the Code, as noted above, provides that "[t]he control and regulation on the part of the State of the development of the waters of the State shall *be paramount*, and *shall be exercised through the agency of the State Corporation Commission* . . . ." (Emphasis supplied.) "Paramount" is defined by *Black's Law Dictionary* as "of the highest rank or nature" and as "chief; pre-eminent; supreme" by *Webster's New Collegiate Dictionary*. See also *Commonwealth* v. *B&O R.R. Co.*, 12 Va. L. Reg. 302 (1906).

In this regard, it should be noted that a considerable amount of legislation has been enacted in recent years as a result of the increased demands placed upon the State's water resources. Consequently, authority to exercise control over defined—and limited—areas of water uses has been conferred upon a number of special agencies: the State Water Control Board, the Division of Water Resources of the Department of Conservation and Economic Development, the Marine Resources Commission, the State Corporation Commission, the State Department of Health, the Commission of Games and Inland Fisheries, the Virginia Ports Authority, the Potomac River Basin Commission and the Ohio River Valley Water Sanitation Commission.

In the area of State control and regulation of the development of water power projects, however, the authority of the State Corporation Commission is paramount. Indeed, the scope of authority of the State Corporation Commission is expressly made quite broad. In order to achieve the utilization of the waters of the State to the *greatest practicable extent*, § 62.1-88 of the Code requires that "[b]efore acting upon any application, the *Commission shall weigh all the respective advantages and disadvantages from the standpoint of the State as a whole and the people thereof* and shall make such investigation as may be appropriate as to the effect of the proposed construction upon any cities, towns and counties and upon the prospective development of other natural resources and the property of others." (Emphasis supplied.)

In this regard, I direct your attention to § 62.1-44.6 of the Water Control Law which states as follows:

> "*This chapter is intended to supplement existing laws* and no part thereof shall be construed to repeal any existing laws specifically enacted for the protection of fish, shellfish and game of the State, except that the *administration of any such laws* pertaining to the pollution of State waters, as herein defined, *shall be in accord with the purpose of this chapter and general policies adopted by the Board.*" (Emphasis supplied.)

In my opinion the General Assembly has declared its intention that the Water Control Law shall not override certain existing laws; rather the Water Control Law shall supplement and aid existing statutes dealing with the waters of the State.

Therefore, in response to your first question, I am of the opinion that in water power projects the final decision as to flow release schedules is that of the State Corporation Commission. However, the Legislature has directed that the administration of such existing laws affecting or touching upon pollution of State waters as defined in § 62.1-44.3(6) of the Code *shall be in accord* with the purpose of the Water Control Law and the policies of the State Water Control Board adopted pursuant thereto. Thus, the State Corporation Commission in acting upon applications for licenses to construct dams in the waters of the State, and, particularly, in imposing restrictions on stream flow, must consider the advice and judgment of the State Water Control Board regarding the effect of the proposed project upon the quality of State waters. An appeal of right to the Virginia Supreme Court from an order of the State Corporation Commission is provided by law.

In the case to which you refer, it appears that the original judgment of the State Water Control Board in regard to stream flow was reflected in the State Corporation Commission's order and license to construct. See State Corporation Commission Order of June 12, 1969, *Application of Virginia Electric and Power Company*, Case No. 18,669, p. 3. It also appears from your letter that the State Water Control Board has reconsidered its previous determination and, in its judgment, decided that a greater average minimum release flow is necessary in order to protect the quality of State waters downstream from the North Anna Power Station. Therefore, it is my further opinion that while the State Water Control Board did not have the authority unilaterally to amend its Certificate #1912 after the State Corporation Commission license provisions relating to stream flow had been imposed, the revised findings of the State Water Control Board should be considered by the Commission. The proper procedure for accomplishing this is to petition the State Corporation Commission to reopen its proceedings *pursuant to its own order* that the matter be continued on the docket for such further action as may be taken by the Commission. See State Corporation Commission Order of June 12, 1969, *supra.*

I am aware that such a procedure, regrettably, could be cumbersome and time-consuming, particularly if appellate proceedings are involved; for that reason reference is made to § 62.1-102 of the Code which states that "[t]he provisions, terms, and conditions of any license may be altered or amended at any time by mutual consent of the licensee [VEPCO] and the Commission . . . ."

In response to your second question, it should be noted that by letter of January 23, 1970, the United States Army Corps of Engineers "determined that the North Anna River is not a navigable water of the United States for administration of navigation laws . . . ." (See copy of letter attached.) Since the terms of § 21(b) of Public Law 91-224 applies only to those discharges into the navigable waters of the United States, the State Water Control Board, in my opinion did not have to act on the application by Virginia Electric and Power Company for a "21(b) Certificate of Assurance."

With reference to your concern about future jurisdictional disputes arising out of the regulation and control of water power projects, I am of the opinion that the State Water Control Board has the authority and is the proper agency, pursuant to the Water Control Law and the Governor's designation of April 7, 1970, to issue a certificate of assurance under § 21(b) of Public Law 91-224. However, this is not unqualified and requires a brief analysis of Public Law 91-224.

As you are aware, it is the purpose of this statute to insure that federally licensed activities and facilities which may result in, or cause to be made, any discharges into navigable waters comply with applicable water quality standards. Accordingly, the granting of the federal license or permit is contingent upon the appropriate agency, in this case, the State Water Control Board, issuing its certificate of assurance that the proposed activity or facility will not contravene applicable state water quality standards. In considering any request for a 21(b) certificate, Public Law 91-224 provides that the appropriate agency may either (1) issue the certificate, (2) fail or refuse to act on the same within a reasonable period of time, in which case the requirement of a certificate is deemed to have been waived, or (3) deny the request, in which case no federal license or permit shall be granted the proposed activity or facility.

Although Public Law 91-224 provides for three possible alternatives to be taken by the State Water Control Board, the Board, in considering a 21(b) certificate, is subject to the scope and limitations imposed upon it by the state law that created it. In view of the reasons given in response to your first question, the action of the Board with respect to certificates issued regarding water power projects under § 21(b) cannot be in contravention of the conditions and terms imposed by the State Corporation Commission in its license to construct and operate such water power projects. Therefore, it is my opinion that the State Water Control Board does not have the authority to issue a certificate of assurance under § 21(b) of Public Law 91-224 incorporating therein a requirement of an average instantaneous flow release schedule greater than the schedule set forth in the license issued by the State Corporation Commission.

Two further observations should be noted: (1) on September 29, 1970, this Office issued an opinion in regard to the general powers of the State Water Control Board; the views expressed therein are not modified by this opinion, which is intended to clarify the procedure by which the powers of the State Water Control Board are exercised in the area of water power development projects; (2) your concern and questions have focused upon the delicate—but crucial—policy problems confronting both corporate and governmental entities: how best to balance and accommodate the growing need for electric power and the necessity for environmental protection and enhancement. These problems are heightened when governmental responsibilities are fragmented, conflicting or in need of clarification. In such cases, it would seem advisable to consider legislation to delineate clear lines of responsibility. In this case, especially, there is a definite need to consider the legislation that would redefine—and perhaps redetermine—more clearly the locus of responsibility for controlling stream flow releases from water power projects where water quality standards of the State are affected.

WELFARE—Lien Against Property—Proper only for hospitalization and treatment of indigents when not "assistance."

WELFARE—Lien Against Property—Not allowed for defined "assistance."

September 2, 1970

THE HONORABLE DONALD C. STEVENS
County Attorney for Fairfax County

This is in response to your letter of July 22, 1970, in which you asked my opinion as to whether or not § 63.1-133 of the Code of Virginia, 1950, as amended, has the effect of repealing § 63.1-140 of the Code of Virginia, 1950, as amended.

You stated in part:

> "Pursuant to § 63.1-140, our local Welfare Department follows the practice of having the aid recipient under Chapter 7 of Title 63.1 execute an assignment subrogating the Welfare Department to any right of recovery which the recipient may have against a third party. The local Welfare Department believes this practice may be contrary to the intent of § 63.1-133.1 . . . ."

In my opinion, I feel that the Welfare Department could continue the practice, as outlined above, and not be in violation of § 63.1-133.1. Section 63.1-133.1 states:

> "No lien or other interest in favor of the State or any of its political subdivisions shall be claimed against, levied, or attached to the

EXHIBIT B

Stream Assimilation Analysis, Doswell Waste Treatment Facility, Hanover County, prepared by Ray F. Tesh, Virginia State Water Control Board staff, dated February 1, 1973.

Stream Assimilation Analysis

Doswell Waste Treatment Facility

Hanover County

Antidegradation was applied.

Data

Q(effluent) = 2 MGD

Receiving stream = North Anna River at the confluence with the Little River

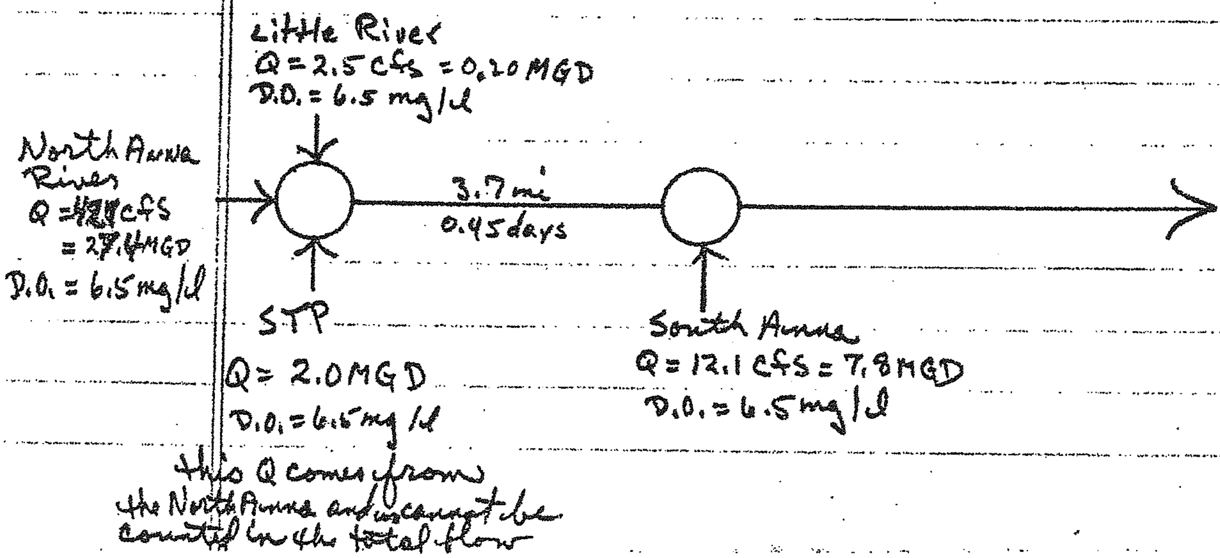
Basin = York
Section 3
Class III A

$K_1 = 0.23 d^{-1}$ } appears to be at 32°C, Based 5 4/30
$K_2 = 0.90 d^{-1}$

D.O. (sat. @ 90°F) 32°C = 7.2 mg/l ✓ ok

D.O. (90% sat.) = 6.5 mg/l ✓

Stream velocity = 0.5 fps = 8.18 mi/day



Calculations:

Assume BOD_5 of 24 mg/l in effluent which would cause an increase in the BOD_5 of stream of

$$(24)(2\,MGD) = (x\,mg/l)(27.6\,MGD)$$

$$x = 1.74\ mg/l\ BOD_5$$

Eff - Ultimate BOD change $= (1.74)(1.3) = 2.26$ mg/l
Ultimate Background in the stream $=$ 3 mg/l
~~Applying this~~ total UOD in stream $= 5.26$ mg/l

Applying the Streeter-Phelps equation to the 3.7 miles to the So. Anna River:

$$D_t = \frac{L_a K_1}{K_2 - K_1}\left[e^{-K_1 t} - e^{-K_2 t}\right] + D_a e^{-K_2 t}$$

$$D_t = \frac{(5.26)(.23)}{.90 - .23}\left[e^{-(.23)(.45)} - e^{-(.90)(.45)}\right] + 0.7 e^{-(.90)(.45)}$$

$$D_t = 1.8\left[0.899 - 0.667\right] + 0.7(0.667)$$

$$D_t = 0.418 + 0.467 = 0.885$$

or the D.O. at this point is $7.2 - 0.9 \doteq 6.3$ mg/l. which does not contravene <u>non-degradation</u>

adding in the flow from the South Anna River will give the following BOD and D.O.:

BOD ultimate

$$\frac{(5.26\,mg/l)(27.6\,MGD)+(3.0\,mg/l)(7.8\,MGD)}{(27.6\,MGD)+(7.8\,MGD)} = 4.76\ mg/l$$

4.82

D.O.

$$\frac{(6.3\,mg/l)(27.6)+(6.5)(7.8)}{(27.6+7.8)\,MGD} = 6.35\ mg/l$$

Applying these new values to the Streeter-Phelps equation at 15 miles downstream where the D.O. sag point will occur:

$$\frac{15\ mi}{8.19\ mi/day} = 1.83\ days$$

$$D_t = \frac{(4.76)(0.23)}{0.90-0.23}\left[e^{-(.23)(1.83)} - e^{-(0.90)(1.83)}\right] + 0.85\,e^{-(0.90)(1.8}$$

$$D_t = 1.63\left[0.657-0.192\right]+(0.85)(0.192)$$

$$D_t = 0.74 + 0.16 = 0.90\ mg/l\ \text{deficit}$$

or a D.O. at the sag point of (7.2 − 0.90) 6.3 mg/l which does not contravene standards.

From the above it can be seen that 24 mg/l BOD_5 in a 2.0 MGD effluent will not contravene ~~slae~~ nondegradation standards for a 10-year 7day drought flow condition. This is greatly assisted by the guaranteed 40 CFS from the vepco dam on the No. Anna. Since the letter of inquiry from Wm F. Goodfellow proposes an initial flow of 0.5 MGD and a long range flow of 2.0 MGD, the 24 mg/l with a minimum D.O. of 6.5 mg/l will suffice for both levels

1 Feb 1973

R F Tesh

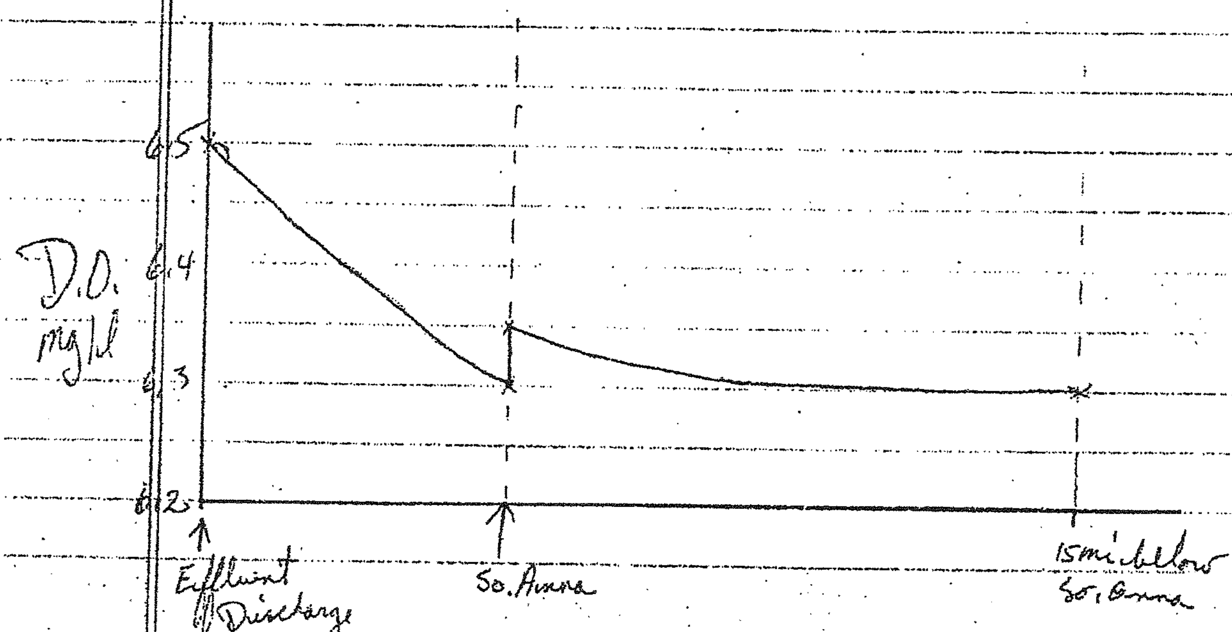


EXHIBIT C

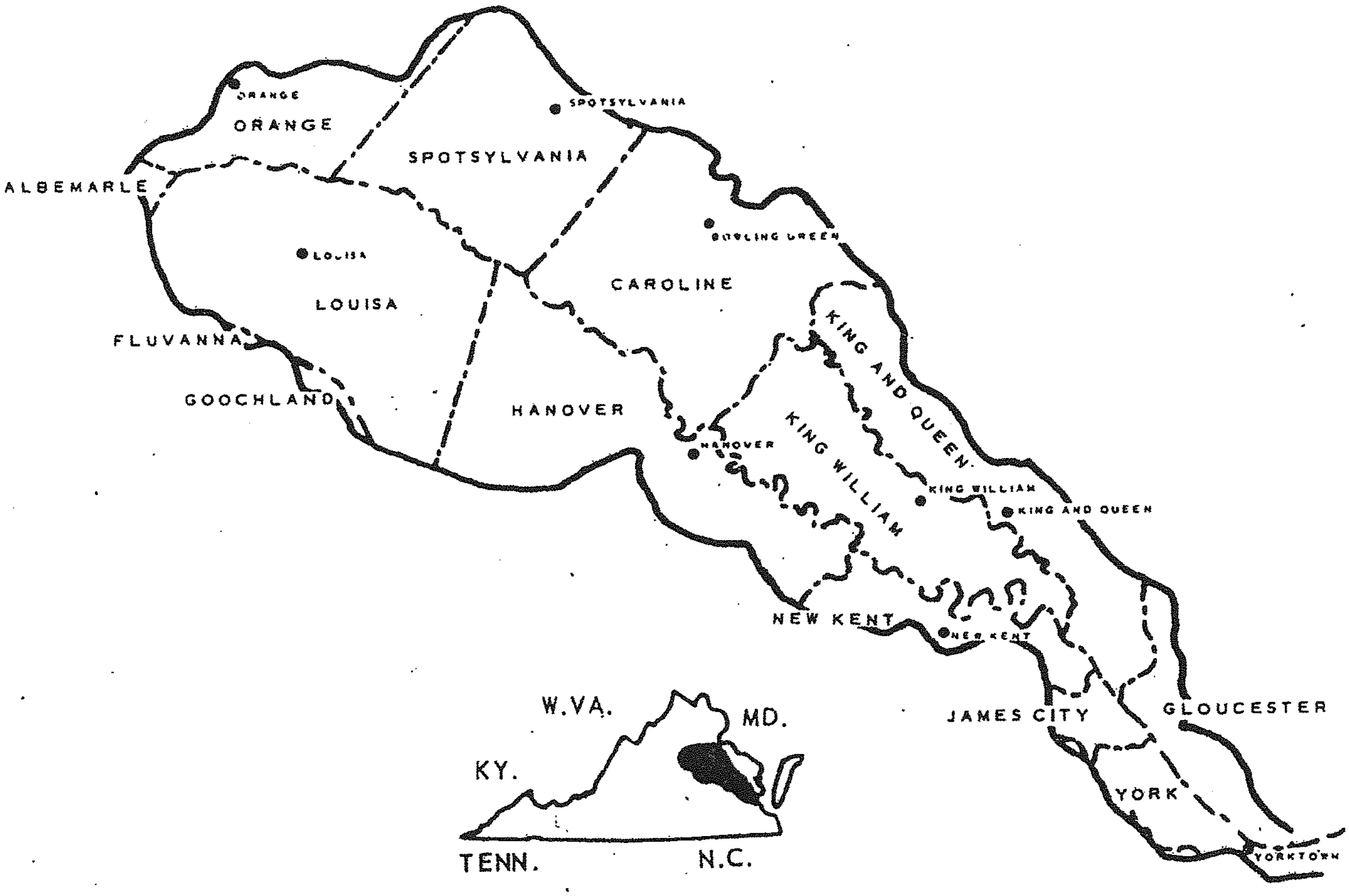
Extract from York River Basin Water Quality Management Plan, Volume V-A, Planning Bulletin 229-A, Roy F. Weston, 1976.

PREPARED FOR

VIRGINIA STATE WATER CONTROL BOARD

BY ROY F. WESTON

YORK RIVER BASIN



BASIN WATER QUALITY MANAGEMENT PLAN

VOLUME V-A

PLANNING BULLETIN 229-A

1976

The commercial shellfishing industry in Virginia takes in 65.1 million lbs per year (1974) with an estimated dockside value of over $12.2 million. This provides employment for an estimated 36,000 persons. Also, in 1974 over 293,000 persons engaged in recreational harvesting of shell fish.

In this study, each of the water uses was considered in terms of the required water quality to support its use or the impact of its use on water quality.

F. Water Quality Problem Areas

1. Significant Problems

Significant water quality problem areas are defined as those areas where stream standards are consistently being violated. A detailed discussion about these areas appears later in this report, and the discussion here is limited to a summary of potentially significant water quality problem areas.

1. South Anna River:

    a. In the vicinity of and just downstream of Gordonsville's treatment plant.

    b. In the vicinity of and just downstream of Ashland's treatment plant.

2. Pamunkey River:

    a. Below the proposed Hanover County regional treatment plant site which will discharge near Nelson's Bridge.

    b. Near West Point Bridge.

3. Mattaponi River:

    a. In the vicinity of and just downstream of the Thornburg treatment plant.

    b. In the vicinity of and just downstream of the Bowling Green treatment plant.

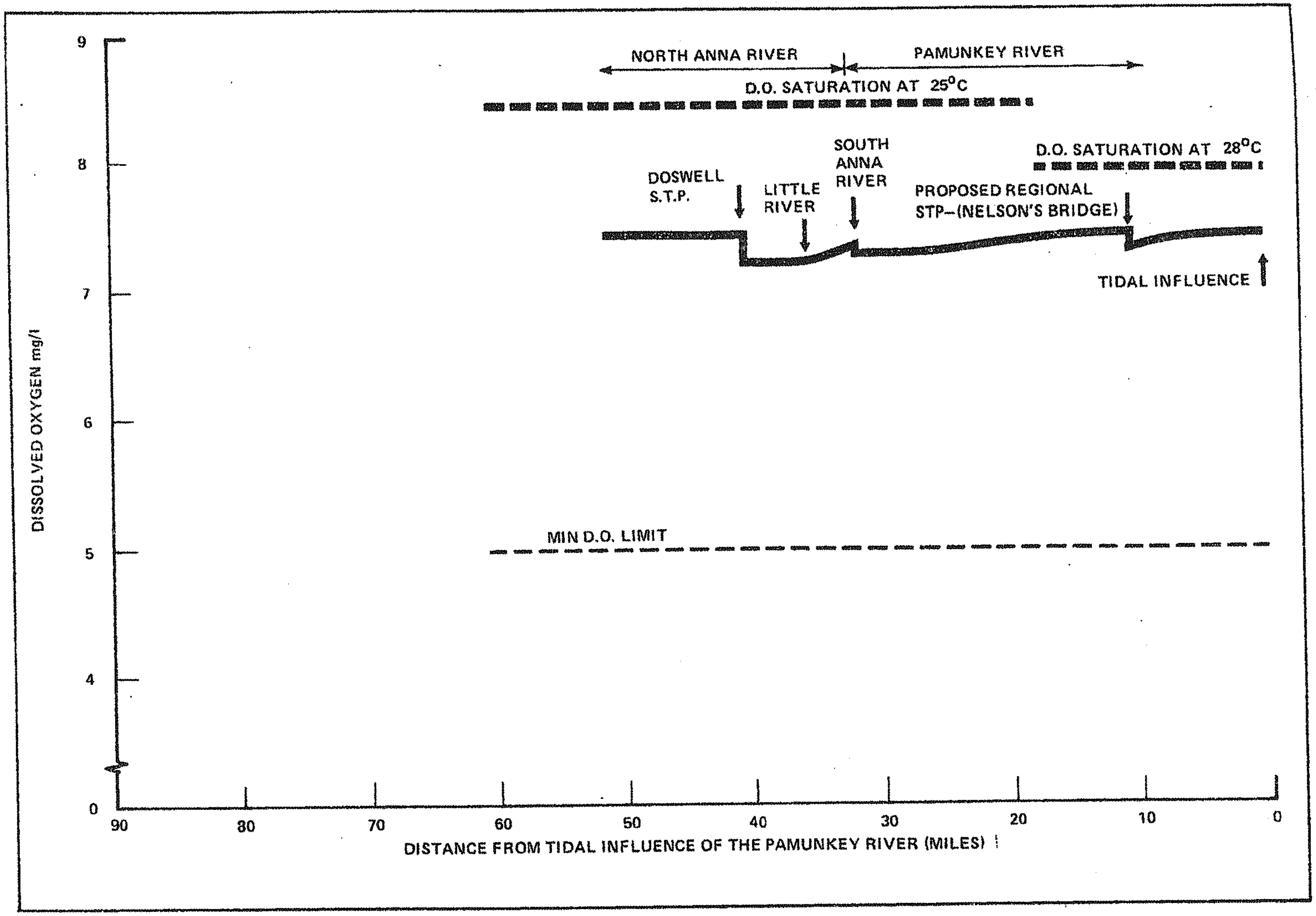


FIGURE IV - 4 ESTIMATED DISSOLVED OXYGEN PROFILE OF THE NORTH ANNA AND PAMUNKEY RIVERS UNDER 1977 LOADING CONDITIONS.

(End of tidal influence on the Pamunkey River is at River Mile 56.)